



Narrative Information Sheet
Brownfields Cleanup Grant Application – Hazardous Substances and
Petroleum
Former Fairfax Textile Mill
201 Boulevard
Valley, Alabama 36584
January 30, 2019

1. Applicant Identification:

City of Valley, Alabama
P.O Box 186
20 Fob James Drive
Valley, Alabama 36584

2. Funding Requested:

a) Grant Type:

Single Site Cleanup

b) Federal Funds Requested:

i). \$500,000

ii) No cost share waiver requested

iv) Contamination:

Hazardous Substances and Petroleum

3. Location:

201 Boulevard, Valley, AL 36584

4. Property Information:

Former Fairfax Textile Mill

5. Contacts:

a) Project Director

Travis Carter

Director of Planning and Development

City of Valley

P.O. 186

20 Fob James Drive

Valley, Alabama 36854

334-756-5249

TCarter@CityOfValley.com

b) Chief Executive

Leonard Riley

Mayor

City of Valley

P.O. 186

20 Fob James Drive

Valley, Alabama 36854

334-756-5225

6. Population: 9,524



CITY OF VALLEY

7. Other Factors Checklist:

Other Factors	Page #
<i>None of the Other Factors are applicable.</i>	
Community population is 10,000 or less.	1
Applicant is, or will assist, a federally recognized Indian tribe or United States	
The proposed brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/redevelopment; secured resource is identified in the Narrative and substantiated in the attached documentation.	3
The proposed site(s) is adjacent to a body of water (i.e., the border of the site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	
The proposed site is in a federally designated flood plain.	
The redevelopment of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	

A support letter from the Alabama Department of Environmental Management is included as Attachment A, followed by the narrative proposal (Attachment B) and Threshold Criteria (Attachment C). We are confident that our application has been prepared in accordance with your guidelines, and that our project represents an excellent candidate for funding.

Attachment A
ADEM Support Letter



Alabama Department of Environmental Management
adem.alabama.gov

January 23, 2019

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

Mr. Travis L. Carter
Director of Planning and Development
Zoning Administrator
City of Valley
Post Office Box 186
20 Fob James Drive
Valley, Alabama 36854

RE: Brownfields Cleanup Grant Support Letter

Dear Mr. Carter:

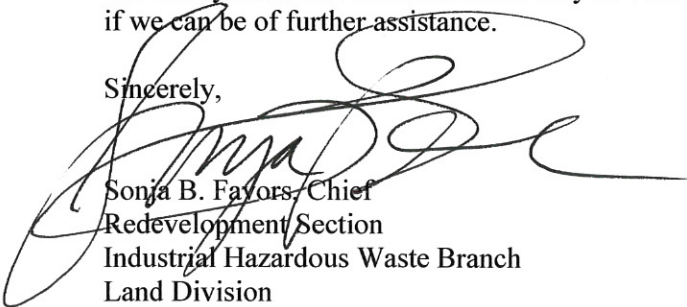
We are pleased to support the City of Valley in its pursuit of a Brownfields Cleanup Grant from the US Environmental Protection Agency (EPA) for the former Fairfax Textile Mill.

We understand that the site is owned by the City and consists of an approximate 16.28 acre tract that formerly housed the Fairfax Textile Mill. The site is located in the center of the community known as the Fairfax Mill Village, and is bounded by River Road, Boulevard Road, and the former Lafayette Street. The site is bordered by residential properties, Fairfax Elementary School, churches, and the newly constructed Valley Fire Station and Training Facility. Local residents, including children, frequently walk across the site and play on it, and it represents an environmental and safety hazard. The mill was closed in 2004, and the only structures present at the site are concrete foundations of the 18 buildings previously located at the site. The site now contains a significant volume of demolitions debris, including concrete, wood asphalt, metal, soil, and other rubble. These materials have been partially segregated, but a Phase II Environmental Site Assessment conducted on the property revealed the presence of asbestos and lead-based paint in portions of the demolition rubble. After cleanup, the City plans to redevelop the site as greenspace until further development plans are completed.

We understand that the City has requested technical assistance from the Department for the Fairfax Textile Mill site; however, these funds and resources are available on a first-come first served basis. Therefore, we look forward to being able to assist you where possible as the project develops, including participating in brownfields outreach activities needed to accomplish the City's goals.

We wish you and the residents of the City of Valley success in the pursuit of these funds. Please let us know if we can be of further assistance.

Sincerely,



Sonja B. Fayors, Chief
Redevelopment Section
Industrial Hazardous Waste Branch
Land Division
SBF/AME

cc: Mike McCown via email, mike.mccown@ppmco.com



Attachment B
Narrative Proposal

FAIRFAX MILL/CITY OF VALLEY, ALABAMA CLEANUP GRANT PROPOSAL

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION (30 points)

1.a Target Area and Brownfields (8 points)

i. Background and Description of Target Area (3 points)

The City of Valley, Alabama (population 9,331) is located in Chambers County along the Georgia-Alabama state line. The area changed from an agricultural economy to one based on textiles prior to the turn of the century, a time historians call the “Age of Textiles in the South”. This economic shift was the beginning of what would, over 100 years later, become the City of Valley. Only incorporated in 1980, its history dates back to the late 1860s when twin textile mills and towns, Langdale and Riverview, were built on the banks of the Chattahoochee River. In the early 1900s, two additional mills and mill villages, Shawmut and Fairfax, were built and in 1980 these four mill towns incorporated to form the City of Valley.

For well over 100 years, the neighboring towns of Langdale, Riverview, Shawmut, and Fairfax were dependent upon the textile industry for their way of life and the area thrived and flourished as this was when 'Cotton was king'. West Point Manufacturing, which went through several name changes over the years and is today called West Point Home, Inc., furnished the towns with whatever they needed in the way of recreation, churches, stores, jobs, schools, ...everything. All that changed in the latter part of the 1990s and early 2000s when textile manufacturing began moving overseas. Residents of the Valley area were heavily dependent upon the textile industry since the late 1860s. As textile jobs were outsourced, the City began losing jobs, and today all six textile mills have closed. Since 2003, over 4,000 people lost their jobs in Chambers County, over 75% of them were residents of City of Valley. Other business closings followed, leaving in its wake numerous abandoned buildings and brownfield sites.

The poor economic, environmental, and health conditions in the area and the associated brownfields resulted in EPA awarding a Brownfield Community-Wide Assessment Grant in 2007, along with Brownfield Cleanup Grants for the Langdale and Riverview Mills, which are similar properties to the target site of this Cleanup Grant Proposal, the Fairfax Mill. It closed in 2004. The mill has been partially demolished, leaving in its wake a significant environmental challenge, as described in **Section 1.a.ii**. Cleanup of the Fairfax Mill is the focus of this grant application. With the decline of the American textile industry, Valley is determined to reinvent itself, with a primary focus being the recreational activity possibilities at the nearby Chattahoochee River. Cleanup of the Fairfax Mill is just one more step in the progression toward redevelopment/reinvention.

ii. Description of the Brownfield Site (5 points)

The target site for this Cleanup Grant is Fairfax Mill, purchased by the City in August 2018 (after All Appropriate Inquiry). It measures approximately 16 acres and is located in the center of town. It is bordered by residential properties to the southeast, Fairfax Elementary School to the southwest, First Baptist Church to the west, and Fairfax United Methodist Church to the east. The only structures present at the site are concrete foundations, as all of the 18 buildings previously located at the site were demolished by the previous owner, EAC Enterprises, LLC, who purchased the property in 2016 to recover marketable building materials from the mill prior to demolition. Unwise attempts at controlled on-site burning of some of the demolition debris resulted in a large fire in the main mill building. A large portion of the building was damaged, and the remainder of the building was razed. Roughly 17,000 tons of demolition debris, including concrete, wood, asphalt, metal, soil, and other rubble remain onsite, posing a health and safety hazard to area residents. These materials have been partially segregated, but a Phase II Environmental Site Assessment (ESA) conducted in August 2018 prior to purchase by the City revealed the presence of asbestos-containing materials (ACM) and lead-based paint (LBP) in the rubble. The Alabama Department of Environmental Management (ADEM) has rules regarding the disposal of wastes containing ACM and LBP. A concrete-lined pond used in the former mill operations is located in one portion of the site, which is also partially filled with debris and contaminated pond water. Elevated concentrations of polynuclear aromatic hydrocarbons (PAH) were identified in shallow soils in the former mill oil storage area, which indicates a petroleum release. An estimated 150 cubic yards/200 tons of petroleum-impacted soils remains in this area that requires remediation. Access to the property is not secure, allowing neighborhood children, many walking over from the adjacent elementary school, to become

exposed to contaminated media via ingestion (lead), inhalation (ACM/PAH), dermal contact, and injection (sharp contaminated debris hazards). The presence of these waste materials represents an actual health and safety threat to the community, and Valley purchased the site in 2018 as the first step in finding a solution to the problem. These findings indicate that the primary contaminant of concern (COC) at the site are ACM and LBP (present in many of the demolition rubble materials) and petroleum (small area of shallow soils). Groundwater was encountered in three borings during the Phase II ESA; but no impact was documented. EPA Brownfield Cleanup funding would help the City remove this health and safety threat and return the site to beneficial reuse.

1.b. Revitalization of the Target Area (12 points)

i. Redevelopment Strategy and Alignment with Revitalization Plans (7 points)

Valley has evaluated numerous alternatives for redeveloping the site after cleanup. The site is located in the center of a residential community, adjacent to a school, and represents an excellent candidate for use as greenspace, a park, and/or multi-family housing. The immediate plan is to develop the site into a large greenspace, which would fit perfectly with the surrounding community. Additionally, City officials recently met at the site with Prescott Development, a large-scale developer of multi-family housing projects, to evaluate the feasibility of such a project on a portion of this site. Prescott representatives indicated a strong interest in the site. Both uses align with the City's Comprehensive Plan, which is in the final stages of completion by the East Alabama Regional Planning and Development Commission (EARPDC), a City partner. The draft Plan has been provided, and the final will be published in early 2019, providing a framework for progress to help Valley achieve its full potential.

A community survey was conducted to garner public input and direction for the Comprehensive Plan. Results of this survey revealed a strong interest in redevelopment of the former mill properties, likely attributed to the residents' desire to keep a remnant of the City's industrial mill history alive coupled with the possibility of business investment and environmental protection of the former mill sites. According to the Community Survey, 64% of the respondents felt the city should create and implement a plan to reuse the old mill properties. Approximately 34% of respondents felt that proper reuse of the mill properties is the number 1 most important need in the City and 26% felt the number 1 need was more retail and commercial business opportunity. The mill properties of Langdale and Riverdale (already assessed and cleaned up under previous EPA brownfield grants) provide an excellent location for commercial and multi-family use, being adjacent to the Chattahoochee River. The Fairfax Mill Site is also located in a convenient location for redevelopment, being at the center of the residential community of Fairfax and adjacent to Fairfax Elementary School, and two churches.

The Comprehensive Plan addresses economic development, housing, community facilities and utilities, transportation, the environment, and land use/zoning. Objectives and goals were developed for each of these key areas, and there are **six direct references to the redevelopment of the Fairfax Mill** within these categories in the Plan, including obtaining an EPA Brownfield Cleanup Grant. Potential options for redevelopment included a new city park (greenspace), multi-family housing, or creation of a textile museum to highlight and preserve the City's mill history which is so important to residents. The spotlight on redevelopment of the Fairfax Mill in the Comprehensive Plan, which is based in great part on community input, aligns perfectly with the City's intended development as greenspace in the near future with the possibility of multi-family housing in the long term.

ii. Outcomes and Benefits of Redevelopment Strategy (5 points)

Cleanup of the former Fairfax Mill and development as greenspace will create numerous outcomes and benefits. Green spaces are a great benefit to the environment, as they filter pollutants and dust from the air, provide shade and lower temperatures in urban areas, and reduce erosion of soil into waterways. Other greenspace advantages include helping regulate air quality and climate by reducing energy consumption by countering the warming effects of paved surfaces, recharging groundwater supplies and protecting lakes and streams from polluted runoff. The health benefits of greenspace creation are equally impressive, and parks are emerging as important public health solutions in urban communities. Developing the site into greenspace will encourage active living, where people can enjoy

walking and bike paths, and playing fields, as well as creating opportunities to reduce the occurrence of chronic diseases such as diabetes, heart disease and respiratory problems. Greenspaces improve moods and attitude, reduce stress, improve mental health and creativity, and build social capital. Redeveloping a contaminated former industrial site into a large greenspace is an excellent use of EPA brownfields cleanup funding and will represent a tremendous outcome from a brownfields cleanup action. In addition, the proposed redevelopment will result in a reduction in carbon emissions by providing a large park-like destination within walking distance of many local residents, thus reducing dependence on driving vehicles to enjoy such places.

1.c Strategy for Leveraging Resources (10 points)

i. Resources Needed for Site Reuse (7 points)

It should be noted that the City only purchased in late 2018, and has only just begun to secure leveraged resources. The following have been secured thus far:

- ADEM previously provided assessment resources for the cleanup of the Langdale and Riverview Mills. Valley has requested ADEM Section 128(a) assistance for additional waste segregation sampling to further determine which wastes can remain on site and which must go to an offsite landfill. ADEM has indicated they will fund this effort if possible as the project develops (*see support letter in Attachment A*). Funding is estimated at **\$12,500**.
- The EARPDC, of which Valley is a member, has developed Valley's Comprehensive Plan that incorporates redevelopment of the Fairfax Mill as an important element. The EARPDC has agreed to use their extensive resources to help Valley find additional sources of funding to complete park infrastructure after the cleanup is complete. This will save the City a significant amount of research time, estimated to equate to a value of **\$20,000**. A support letter from the EARPDC is included in Attachment A.

An initial list of organizations that the City plans to contact for greenspace development assistance in 2019 include: Alabama Department of Economic and Community Affairs (ADECA); Appalachian Regional Commission; Land and Water Conservation Fund; Department of Agriculture Community Facilities Grant Program; and National Park Service through its Rivers, Trails, and Conservation Assistance program. This list will be expanded with the assistance of the EARPDC as described above.

ii. Use of Existing Infrastructure (3 points)

Greenspace will constitute a low-impact project that will not require the installation of new infrastructure. Storm sewer piping is already present at the site, as well as city water. Sidewalks are also present throughout the adjacent residential areas that will provide access to the new greenspace. No other infrastructure is anticipated to be needed for the initial phase of development.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT (20 points)

2.a. Community Need (12 points)

i. The Community's Need for Funding (3 points)

The City of Valley, at 9,331 residents, and the target area around the Fairfax Mill (Census Tract 9546), of approximately 3,000 residents, are considered a small population community which faces extensive challenges when compared to national, state, and county average statistics, as shown in the following table:

Table 1, Economic and Health Conditions in Target Area

Metric	CT 9546	Valley	Chambers County	Alabama	USA
Population	3,056	9,331	33,895	4,850,771	321,004,407
Under 5 years	4.9%	6.8%	6.1%	6.0%	6.2%
65 and over	19.6%	14.2%	18.6%	15.7%	14.9%
Percent Minority	32.2%	46.8%	43.8%	34.1%	38.5%
Unemployment Rate	8.4%	5.8%	6.4%	7.4%	6.6%
Median Household Income	\$36,585	\$37,395	\$37,342	\$46,472	\$57,652
Low Income Population*	46%	42%	46%	39%	34%
Infant Mortality**	-	-	13.3	8.3	5.9
Black Infant Mortality**	-	-	22.5%	13.2%	10.9
Cancer***	-	-	277.8	212.3	163.5
Heart Disease Deaths**	-	-	295.5	263.7	165.5

Source: US Census Bureau, American Factfinder, 2017 ACS 5-year estimates; *EPA's EJ Screen Report Tool; ** Alabama Department of Public Health 2017, *** cancer.gov

ii. Threats to Sensitive Populations (9 points)

(1) Health or Welfare of Sensitive Populations

Areavibes.com shows generally poor health and welfare conditions in the target area. For example, this source indicated that the overall crime rate in Valley is 114% higher than the Alabama average; and 172% higher than the national average. The violent crime rate is 32% higher than the Alabama average, and 81% higher than the national average, while the property crime rate is 129% higher than the Alabama average, and 186% higher than the national average.

The condition and threats to sensitive/vulnerable populations in low-income/economically disadvantaged areas, such as Census Tract 9546 where the Fairfax Mill is located are well known. Sensitive populations, such as the numerous individuals over the age of 65 and minorities who live in the target area (see Table 1), are at greater risk from environmental exposures, such as those associated with LBP and asbestos which are already documented to be present at the former mill site. The City also has safety concerns associated with the site due to its accessibility by nearby residents and children from the immediately adjacent school. The lack of fencing provides easy access for children that live in the neighborhood to be exposed to both health and safety hazards found onsite.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions (3 points)

Table 1 above illustrates the health challenges for the area. The infant mortality rate in Chambers County (13.3%) is over twice that of the US (5.9%); and the infant mortality rate for African Americans is nearly twice that rate at (22.5%). In addition, the adequacy of prenatal care in Chambers County is only 40.6 % (according to a report entitled *Alabama Vital Statistics, January 2013*). The table also shows that the cancer mortality rates are 277.8 per 1,000 vs. the US average of 163.5. Similarly, heart disease deaths per 1,000 in the County are 295.5: almost twice that of the US average (165.5).

Scorecard.com reports that across the US, 2.2% of all preschoolers have enough lead in their blood to reduce intelligence and attention span, cause learning disabilities, and permanently damage a child's brain and nervous system. LBP is documented to be present in the demolition debris at the Fairfax Mill, and needs to be addressed. Data indicate that approximately one in every ten Alabama residents currently has asthma, that asthma prevalence rates are increasing, and that the State's rates for both lifetime and current asthma now exceed those for the U.S. as a whole. Although it is found within all subcategories of the population, the burden of asthma is unequally borne by children, females, African Americans, and those with low income and educational levels – such as those living inside the target

area. These data also revealed that asthma rates for African Americans in Alabama average three percentage points higher than that of whites. Lastly, according to the Alabama Department of Public Health, current asthma prevalence in children in Alabama is 11.2% compared to the National rate of 8.9%. Some of these health problems could be associated with exposure to hazardous substances, such as lead-based paint and asbestos, which is documented to be present in the demolition debris at the Fairfax site.

(3) Economically Impoverished/Disproportionately Impacted Populations

Table 1 show significant economic disparities in every category. Most notably, the low income population percentage (46%) in the Fairfax Mill Census Tract is higher than the rest of the City (42%), and significantly higher than Alabama (39%) and the US (34%). *Neighborhood Scout's* research shows that this area has an income lower than 77.1% of U.S. neighborhoods. The same is true for unemployment, with the rate in the target Census Tract higher than all of the other geographic areas, and the median household income lower. *Neighborhood Scout* also shows that the Fairfax area has a 13.9% house vacancy rate, which is higher than 71.7% of U.S. neighborhoods. The low-income status of the community has created an inability to draw on other initial sources of funds for redevelopment projects. In addition, Valley does not currently have the manpower or tax revenue to complete cleanup of the site, highlighting the need for EPA brownfield cleanup funding. Blight is common in the area, and the large number of empty and abandoned houses contribute to lower property values. As shown in Table 1 above, the percentage of the population over 65 in the Fairfax Mill Census Tract is higher than the other comparative geographic areas, likely a result of the Fairfax mill closure leaving senior citizens with few options to seek better conditions.

2.b. Community Engagement (8 points)

i. Community Involvement (5 points)

The site selection, cleanup method, and redevelopment has already been decided and presented to the community in a public meeting. Numerous other partners are excited about the cleanup effort, indicating a desire to help see the former mill site redeveloped as greenspace. These partners include:

Table 2- Teaming Partners		
Partner	Point of Contact (name, phone, & email)	Specific Role
The Trust for Public Lands	Susan Patterson, Director of Philanthropy, 404-873-7306 ext. 260, susan.patterson@tpl.org	Assist with any required institutional controls after cleanup is complete and with long-term stewardship. Identify incentives (conservation easements, etc.) for public lands.
The Charter Foundation (non- profit charitable foundation)	Bonnie Bonner, 706-518-9440, ronnieb1red95@charter.net	Assist with identifying philanthropic and government grant resources for greenspace improvements after cleanup.
Fairfax Elementary School (adjacent to site)	Fran Groover, 334-756-2966 , grooverfd@chambersk12.org	Provide community meeting space.
Chamber of Commerce	Carrie Royster, 334-642-1411, chamber@greatervalleyarea.com	Assist with informing area businesses and residents of the redevelopment.
Kiwanis Club of Valley	Henry Bledsoe, 334-756-7253, valleykiwanis@live.com	Assist with outreach for CE Events.
Fairfax United Methodist Church	Melisa Saccucci; 334-756-3070, fairfaxchurch@gmail.com	Youth to build community garden at Fairfax site after cleanup.

Table 2- Teaming Partners		
Partner	Point of Contact (name, phone, & email)	Specific Role
Chambers County Development Authority	Valerie Gray, Executive Director, 334-642-1413, vgray@chambersida.com	Assist with identifying incentives for redevelopment and potential private sector investors.

ii. Incorporating Community Input (5 points)

Community involvement is a key element in the City's planning process, and the City has always given its citizens the opportunity to participate in its community planning and uses this input in its redevelopment plans. This process was used in development of Valley's brand new Comprehensive Plan described in **Section 1.b.i.**, which yielded specific input on the Fairfax Mill property. Another example of incorporating community input is the brownfield redevelopment outreach conducted for the Riverview Mill. For this project, the City, EPA and the US Army Corps of Engineers hosted a Planning Charrette for the Riverview Mill brownfield cleanup; as well as the Tri-City Chattahoochee River Visioning Workshop. These workshops were well-attended by the community, and similar techniques will be used when Valley implements a Community Involvement Plan (CIP) for the Fairfax Mill redevelopment. Valley recently hosted a public meeting to discuss the proposed redevelopment which drew local residents, partners, and City officials. Concerns regarding the impacted demolition rubble and safety hazards at the site were discussed openly, and the interest level for cleanup of the site and redevelopment as greenspace was high. The meeting was advertised in advance, and the local press was present. A draft of the Analysis of Brownfield Cleanup Alternatives (ABCA)/grant proposal was available for review. No objections to the project were raised, and Valley is confident that we have full community support for the cleanup and redevelopment. An additional meeting will be held prior to scheduling of construction activities, which will be advertised through the previously used effective methods (website updates, social media posts, direct responses by phone, or meetings and email based on the preferences of the inquirer). Monthly briefings will be posted on the brownfield section of the City website and social media pages as the project progresses. Once cleanup is complete, a ribbon cutting ceremony will be held to celebrate the achievement. ADEM and the EPA will be invited to attend the ribbon cutting along with the local community.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS (35 points)

3.a. Proposed Cleanup Plan (8 points)

Valley has already obtained technical assistance from an Environmental Professional (EP) to develop a draft ABCA that presents several alternatives to clean up the site. Numerous site visits were made to study the challenges at the former mill site. The Valley Police Department provided recent drone footage of current conditions at the site, which were imported into engineering software to provide a preliminary estimate of the volume of rubble that needs addressing, calculated at 17,000 tons. Meetings were held with the ADEM Solid Waste Division and the Redevelopment Section to discuss site conditions and alternatives for cleanup. ADEM indicated that they would work with the City to help find a solution that fits the planned redevelopment of the site and the limited City resources. An onsite meeting was also held with an environmental construction contractor experienced with similar large scale projects to develop conceptual cost estimates. The alternative deemed to be the most implementable and effective was excavation of the limited area (150 cubic yards/200 tons) of PAH-impacted soils; movement of inert demolition wastes to the low and sloped areas at the site, and offsite disposal of waste containing ACM and LBP at a Subtitle D landfill. The following actions will be conducted to implement this alternative:

- Continued segregation of wood and metal wastes from the existing piles.
- Entry of the site into the ADEM Voluntary Cleanup Program (VCP). Cleanup planning documents will include a waste segregation sampling plan that will be approved by the ADEM Solid Waste Division. The segregation sampling plan will augment the previous Phase II sampling conducted at the site to further segregate those waste piles

containing ACM and LBP from those that should be classified as inert materials. **Note:** Valley will pay for this additional sampling using their own funds, or will get assistance from the ADEM Redevelopment Section, and costs will not be applied against the cleanup grant funds.

- Preparation of bid documents for the proposed waste removal effort and solicitation of bids from qualified contractors.
- Filling of low areas on the east side of the site with those materials deemed to be inert (no painted wood, metal, or materials that contain ACM or LBP).
- Transportation and disposal of wastes that cannot be used as onsite fill (i.e., those containing ACM or LBP) at an offsite approved Subtitle D landfill.
- Excavation and offsite disposal of shallow PAH-impacted soils from the former oil storage area.
- Covering of the site with clean, imported fill and a layer of topsoil, and reseeded with grass.

Careful segregation of the wastes to reduce the volume requiring offsite disposal will be a key element of the project. For planning and cost estimating purposes, 7,800 tons of the demolition rubble materials and 200 tons of PAH-impacted soils were assumed to require offsite disposal in a Subtitle D landfill (total of 8,000 tons), with the remainder staying on site for use as fill. Excavation of demolition wastes is a common method of cleanup, and the City is confident in the feasibility and effectiveness of the proposed cleanup method as presented in the draft ABCA.

3.b. Description of Tasks and Activities (12 points)

The following describes the major tasks to be completed, the activities/subtasks associated with each task, who will lead task efforts, the anticipated outputs, the schedule for completion, and how other teaming partners will contribute to the effort. Projected costs for each of the major tasks and subtasks are included in Table 3 in **Section 3.C, Cost Estimates**, with cost details in the footnotes at the bottom of the table. Outputs are listed in **Section 3.c.ii**.

Task 1, Project Management/Administrative. This task includes City (the Applicant) and EP time to administer the grant. The City will not charge personnel time against the grant for this task. Tasks to be conducted by the City will include development of the project work plan and execution of the Cooperative Agreement, or CA, (30 days after award); contracting an EP per EPA competitive guidelines (60 days after award); preparing quarterly/annual progress reports, ACRES entries, and final closeout documents (within 30 days of end of each quarter); and travel to a brownfield conference (Mayor and Grant Manager in the first year of the grant period). The EP, reporting directly to the City Grant Manager, will assist with overall grant management/reporting. See Table 3 for cost details.

Task 2, Community Involvement. Community involvement will be facilitated by the City and the EP. A Community Involvement Plan (CIP) will be developed and submitted with the work plan (within 30 days of grant award), and updated as the project progresses (one update anticipated based on initial community meeting feedback). Three community meetings are anticipated to be held (prior to construction, mid-construction, and at project completion) to update and solicit input from the community. See Table 3 for cost details.

Task 3, Cleanup Planning. This will be a joint effort between the City (management portions and final approvals) and the selected EP (technical direction and documents). This task includes finalization of the ABCA and attendance at VCP meetings with ADEM (60 days after award); submittal of VCP documents and waste segregation sampling plan (Quarter (Q) 2); conducting the waste segregation sampling (Q2, with ADEM as teaming partner); preparation of a CAP with a health and safety plan; and waste removal plans, specifications and bid documents; (Q3); attendance at pre-bid meeting (Q3), and solicitation of bids from qualified environmental construction contractors (Q3). See Table 3 for cost details.

Task 4, Cleanup Activities. The City Grant Manager will oversee the EP who will conduct cleanup activities with the selected environmental construction subcontractor. Construction is estimated to begin in Q4, and will include a kickoff meeting, equipment staging, and initial waste removal. Due to the volume of wastes

present, removal actions will likely continue throughout year 2 (quarters 5, 6, and 7). Backfill grading and seeding will be conducted in Q8, and a final report documenting removal actions will be prepared in Q9. All work is anticipated to be completed by Q10. See Table 3 for cost details. Note that petroleum costs are only estimated at \$8,000, as indicated in the table footnotes, as all other costs are assigned to the hazardous budget.

3.c Cost Estimates and Outputs (10 points)

3. c.i. Cost Estimates (7 points)

The anticipated budget for each of the above described tasks above, and details on the 20% cost share, is provided in Table 3 below. Details on how each cost were derived is provided in the table footnotes.

Table 3 – Cost Estimates (Haz. & Pet., see footnote ⁶ for breakout)						
Budget Categories		Project Tasks (\$)				Total
		Project Management/ Administrative	Community Involvement	Cleanup Planning	Cleanup Activities	
Direct Costs	Personnel ¹					
	Travel	\$2,600 ¹				\$2,600
	Equipment					
	Supplies		\$700 ²			\$700
	Contractual	\$9,000 ³	\$3,600 ⁴	\$15,000 ⁵	\$477,100 ⁶	\$496,700
	Other					
Total Direct Costs		\$11,600	\$4,300	\$15,000	\$477,100	\$500,000
Indirect Costs						
Total Federal Funding (not to exceed \$500,000)		\$11,600	\$4,300	\$15,000	\$477,100	\$500,000
Cost share (20% of requested federal funds)				\$32,500 ⁷	\$59,500 ⁸ (in-kind svcs.)	\$100,000
Total Budget (Total Direct Costs+ Indirect Costs +Cost Share)		\$11,600	\$4,300	\$47,500	\$536,600	\$600,000

Federal Funding Details

¹ City Grant Manager and Mayor travel expenses for attendance at one BF conference: \$2,600 (no labor, only conf. fee, travel/expenses)

² Supplies for public outreach meeting: \$700

³ EP to assist with project mgmt./reporting: \$150/hr x 60 hrs. = \$9,000

⁴ EP to assist with CI plan and meeting attendance: \$150/hr x 24 hrs. = \$3,600

⁵ EP to assist with cleanup planning: \$150/hr x 100 hrs. = \$15,000

⁶ EP for cleanup actions: EP oversight (\$150/hr x 100 hrs. = \$15,000) + waste characterization (200 samples x \$50/sample=\$10,000) + construction subcontractor to excavate/haul/dispose of material at Sub-D landfill (8,000 tons x \$40/ton=\$320,000) + onsite movement/disposal of inert materials (9,500 tons x \$11/ton=\$104,500) for total of \$477,100. **Note:** The 8,000 tons for offsite disposal includes 200 tons of PAH-(petroleum) impacted soils. Because this amount is so small (\$8,000) relative to the demo waste (haz.) tonnage/level of effort, no further breakout is provided for petroleum, as all other costs are assigned to the hazardous budget.

Cost Share Details:

⁷ ADEM VCP Fees: \$32,500 – Committed by City

⁸ City equipment operator (\$30/hr x 700 hrs. = \$21,000); + City equipment (\$55/hr x 700 hrs. = \$38,500) = total of \$59,500 (in-kind services)

3.c.ii Outputs (3 points)

Outputs for each of the major tasks described above will include:

- Project Management/Administrative: Outputs for this task will include an executed CA and work plan; grant management oversight; a contract with an EP; 12 quarterly reports; ACRES database updates, and necessary closeout documents.
- Community Involvement: Outputs for this task will include a CIP and three meetings with minutes.
- Cleanup Planning: Outputs for this task will include a final ABCA; a meeting with ADEM and preparation of VCP application; waste segregation sampling plan; construction specification and bid documents; pre-bid meeting, and subcontractor contract documents.
- Cleanup Activities: Outputs for this task will include a kickoff meeting/minutes; equipment staging; removal of impacted soils and demolition rubble; backfilling/grading, and a final cleanup report.

Anticipated outcomes from the cleanup include alignment of EPA funding objectives with redevelopment; removal of blight and safety hazards, reduction or elimination of future contaminant exposure, and creation of greenspace. Greenspace will improve air quality, help control erosion, reduce the warming effects associated with paved surfaces, reduce runoff, and improve public health in numerous ways.

3.d. **Measuring Environmental Results (5 points)**

The City will carefully track all outputs and outcomes to ensure the grant funds are expended in a timely and efficient manner. Upon grant award, these will be clearly identified in the project work plan in a work schedule and will be reported in the quarterly progress reports submitted to the EPA Project Officer as well as updated in the EPA ACRES database. The mechanism for tracking progress will include preparation of a detailed schedule for all tasks and subtasks, including progress/compliance reports, ACRES entries, and construction schedules. The schedule will be updated on a weekly basis via email, with follow up conversations by telephone or face to face meetings as necessary. On-line screen sharing applications will be used as needed for review of drawings and other technical documents. The EPA Project Officer will be included in conversations and decision making as needed. Adjustments to the schedule will be made as the project progresses.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE (15 points)

4.a Programmatic Capability (9 points)

i. Organizational Structure (5 points)

Valley is already experienced with the EPA Brownfield program, as the City has managed a similar cleanup grant at the Langdale and Riverview Mill. The following City employees will manage the grant:

Travis Carter, Planning and Development Director, will serve as the Grant Manager. As Director of the Planning and Development Department, Mr. Carter is responsible for reviewing development permits; administering the city zoning ordinances, and subdivision regulations, and other duties as directed by the Mayor. Mr. Carter has been employed with the City since 2012, and is a graduate of Opelika State Technical College with a degree in Drafting and Design. Mr. Carter initiated the research on the EPA brownfields program for this project, and has been involved with all aspects of the cleanup grant application process. Mr. Carter reports directly to Mayor Leonard Riley, who is leading the efforts to redevelop and transform Valley after the demise of the textile mill industry. **Kathy Snowden, City Clerk/Treasurer**, will provide support to Mr. Carter primarily on the financial management of the cleanup grant. Ms. Snowden has served in this role since 2016, and is the primary contact between the Valley citizens and the government. As Treasurer, she is responsible for maintaining the financial records of the City. Ms. Snowden has a degree in accounting, and MBA, and worked in financial roles since 1980. She will work closely with Mr. Carter ensuring that all grant compliance requirements are met.

ii. Acquiring Additional Resources (4 points)

Valley will contract an EP to assist with technical aspects of the cleanup grant, as was done with the previous brownfield grants. Valley will follow all EPA competitive procurement requirements of 2 CFR Part 200 for EP consultant and contractor selection, and is familiar with all aspects of the contractor solicitation process associated with federal grant funding. Valley is committed that Disadvantaged Business Enterprises (DBEs) have an equal opportunity to participate in the performance of this project. The Consultant/Contractor will make good faith efforts in securing DBE contractors.

4.b. Past Performance and Accomplishments (6 points)

i. Currently Has or Previously Received an EPA Brownfields Grant (6 points)

The City has worked tirelessly since 2005 to secure resources to help assess, clean up, and redevelop the former textile mills in the area. While no funding has been requested or received for the Fairfax Mill (target of this grant application), Valley has received the following brownfield grants from the EPA:

Table 4- Awarded Brownfields Grants			
Description	Target Area/Location	Major Accomplishments	Full Compliance with Grant Requirements?
2007 Community Wide Assessment (\$200,000)	Community Wide	Extensive community engagement; Phase I/II ESAs completed on multiple sites, with priority at former Mill sites.	Yes
2008 Petroleum Cleanup (\$135,000)	Langdale Mill	Cleanup of petroleum completed, design charrettes conducted, extensive community engagement.	Yes
2008 Petroleum Cleanup- (\$100,000)	Riverview Mill	Cleanup of petroleum completed, design charrettes conducted, extensive community engagement.	Yes
2008 Sustainability Pilot (\$25,000)	Langdale and Riverview Mills	Development of inventory of materials that can be reused/recycled prior to demolition	Yes
2011 Cleanup (Langdale Mill- \$65,000, Riverdale Mill- \$100,000)	Langdale and Riverview Mills	Cleanup of metals and inorganic contaminants; additional charrettes; workshops, and public meetings that have been ongoing since 2005.	Yes

ii. Accomplishments (3 points)

Major accomplishments are provided in Table 4 above. More specific outputs for these grants, where applicable, have included execution of the CAs; selection of EPs/consultants to provide technical services through an advertised and open solicitation process; submittal of grant management work plans to EPA; formation of brownfield advisory committees; numerous community meetings; brownfield inventory lists; numerous Phase I and II ESAs; ACRES entry (where applicable); and all required reporting. The Langdale and Riverview Mills have been cleaned up, redevelopment options evaluated, and they now stand ready for reuse.

(1) Compliance with Grant Requirements (3 points)

On these previous grants, the City consistently met its work plan and cooperative agreement requirements, as well ensured timely achievement of results through effective management of project consultants, budgets, and schedules. Valley complied with competitive procurement standards and all subaward/subgrant requirements. All required quarterly and annual reports were submitted on time, and the funds were expended in the manner outlined in the grant proposal. The grant management team is committed to continuing this success and stewardship under this cleanup grant upon award.

ATTACHMENT A
LEVERAGED SUPPORT LETTERS



EAST ALABAMA

REGIONAL PLANNING AND DEVELOPMENT COMMISSION

1130 Quintard Avenue • Suite 300, Quintard Tower • P.O. Box 2186 • Anniston, Alabama 36202
Phone: 256-237-6741 • FAX: 256-237-6763 • E-mail: earpdc@earpdc.org
web site: www.earpdc.org

Lori Hodge Corley
Executive Director

January 28, 2019

Mr. Travis L. Carter
Director of Planning and Development
Zoning Administrator
City of Valley
P.O. 186
20 Fob James Drive
Valley, Alabama 36854

RE: Funding Sources Research Support
Brownfield Cleanup Grant/Greenspace Redevelopment
Former Fairfax Mill, Valley, AL

Dear Mr. Carter:

The East Alabama Regional Planning and Development Commission (EARPDC) understands that the City of Valley is seeking to obtain a brownfield cleanup grant from the Environmental Protection Agency (EPA) to remove the demolition wastes present at the site, so the property can be redeveloped into greenspace. Such usage aligns with the community's desires for the site, as determined in the community survey we conducted for Valley during the Comprehensive Plan development process that we are providing.

We understand that the mill site was only recently purchased by the City, and that Valley will be seeking additional sources of funding to help develop the greenspace/park. While the EARPDC cannot commit to providing funding for the redevelopment at this time, we can offer our assistance in helping you locate and secure those funding sources. Our organization has extensive research and grant-writing capabilities, and we would be happy to assist you with this effort as a continuation of the comprehensive planning process. The dollar value associated with this research and grant-writing is estimated at \$20,000.

We hope you are successful in obtaining the cleanup grant and redeveloping the site as greenspace. We look forward to assisting you with this effort.

Sincerely,

Tyler Ferrell
Director of Planning and Development
East Alabama Regional Planning and Development Commission



Chair
WILLIAM "BILL" BAKER
Mayor, City of Piedmont

Vice-Chair
LEW WATSON
Mayor, City of Lincoln

Secretary
DONNA McKAY
Mayor, Town of Wadley

Treasurer
RICHARD DEAN
Probate Judge, Coosa County

Calhoun Chambers Cherokee Clay Cleburne Coosa Etowah Randolph Talladega Tallapoosa





Alabama Department of Environmental Management
adem.alabama.gov

January 23, 2019

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

Mr. Travis L. Carter
Director of Planning and Development
Zoning Administrator
City of Valley
Post Office Box 186
20 Fob James Drive
Valley, Alabama 36854

RE: Brownfields Cleanup Grant Support Letter

Dear Mr. Carter:

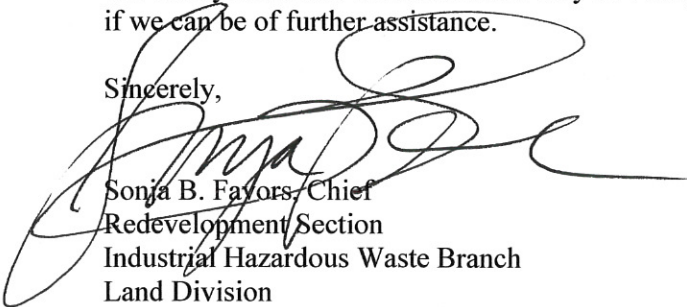
We are pleased to support the City of Valley in its pursuit of a Brownfields Cleanup Grant from the US Environmental Protection Agency (EPA) for the former Fairfax Textile Mill.

We understand that the site is owned by the City and consists of an approximate 16.28 acre tract that formerly housed the Fairfax Textile Mill. The site is located in the center of the community known as the Fairfax Mill Village, and is bounded by River Road, Boulevard Road, and the former Lafayette Street. The site is bordered by residential properties, Fairfax Elementary School, churches, and the newly constructed Valley Fire Station and Training Facility. Local residents, including children, frequently walk across the site and play on it, and it represents an environmental and safety hazard. The mill was closed in 2004, and the only structures present at the site are concrete foundations of the 18 buildings previously located at the site. The site now contains a significant volume of demolitions debris, including concrete, wood asphalt, metal, soil, and other rubble. These materials have been partially segregated, but a Phase II Environmental Site Assessment conducted on the property revealed the presence of asbestos and lead-based paint in portions of the demolition rubble. After cleanup, the City plans to redevelop the site as greenspace until further development plans are completed.

We understand that the City has requested technical assistance from the Department for the Fairfax Textile Mill site; however, these funds and resources are available on a first-come first served basis. Therefore, we look forward to being able to assist you where possible as the project develops, including participating in brownfields outreach activities needed to accomplish the City's goals.

We wish you and the residents of the City of Valley success in the pursuit of these funds. Please let us know if we can be of further assistance.

Sincerely,


Sonja B. Fayors, Chief
Redevelopment Section
Industrial Hazardous Waste Branch
Land Division
SBF/AME

ADEM potential
commitment to
provide 128 a
funding for
sampling

cc: Mike McCown via email, mike.mccown@ppmco.com



Attachment C
Threshold Criteria

**THRESHOLD CRITERIA FOR CLEANUP GRANT
FORMER FAIRFAX MILL
CITY OF VALLEY, ALABAMA**

1. **Applicant Eligibility:** Valley, Alabama, incorporated as a City on May 20, 1980, is a unit of local government as defined in 40 CFR Part 31.3, and is an eligible entity to receive EPA Brownfields Cleanup funding.
2. **Previously awarded Cleanup Grants:** The former Fairfax Mill has not received funding from a previously awarded EPA Brownfields Cleanup Grant.
3. **Site Ownership:** The City is the sole owner of the site that is the subject of the Cleanup Grant and acquired ownership of the site on August 18, 2018 (proof of ownership attached). If awarded a Cleanup Grant, the City of Valley shall retain ownership of the site while Brownfield Cleanup Grant funds are disbursed for the cleanup of the site.
4. **Basic Site Information:**
 - a) **Site Name:** Fairfax Textile Mill (former)
 - b) **Address:** 201 Boulevard, Valley, AL 36854
 - c) **Current Owner:** City of Valley, AL
 - d) N/A
5. **Status and History of Contamination at the Site:** The operational history of the site was that of a former mill site. The site is contaminated with hazardous substances and petroleum. The Mill closed in 2004, and was purchased by another company in 2015 to reclaim building materials. All 18 buildings previously located at the site were demolished. The only structures present at the site are concrete foundations. The nature and extent of contamination includes an estimated 17,000 tons of demolition debris is present at the site, including concrete, wood asphalt, metal, soil, and other rubble. These materials have been partially segregated, but a Phase II Environmental Site Assessment (ESA) conducted on the property prior to purchase by the City revealed the presence of asbestos-containing materials (ACM) and lead-based paint (LBP) in the rubble as environmental concerns. Such non-residential demolition wastes are regulated by the Alabama Department of Environmental Management (ADEM), who has rules regarding the disposal of wastes containing ACM and LBP.

In addition, evidence of a petroleum release was found in a former oil storage area. An estimated 150 cubic yards/200 tons of petroleum-impacted soils is present in this area that also requires remediation and is an environmental concern. The property is not fenced, and neighborhood children often play at the site, many walking over from the adjacent elementary school at the end of the school day. The presence of these waste materials represents a potential threat to the community, and Valley purchased the site in 2018 as the first step in finding a solution to the cleanup.
6. **Brownfields Site Definition:** The site meets the definition of a brownfield under CERCLA § 101(39); is not listed or proposed for listing on the National Priorities List; is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial

consent decrees issued to or entered into by parties under CERCLA; and is not subject to the jurisdiction, custody, or control of the U.S. government.

7. Environmental Assessment Required for Cleanup Proposals: A Phase I Environmental Site Assessment (ESA) was conducted at the site (report date of July 13, 2018) and a Phase II ESA (report date of August 3, 2018) prior to acquisitions using City funds. The Phase II ESA revealed the presence of demolition rubble containing ACM and LBP, and petroleum-impacted soils.

8. Enforcement or Other Actions: There are no ongoing or anticipated environmental enforcement actions related to the brownfield site for which funding is requested. There also are no inquiries or orders for federal, state, or local government entities that we are aware of regarding the responsibility of any party (including the City) for the hazardous substances or petroleum at the site.

9. Property-Specific Determination Information: This site does not require a Property-Specific Determination.

10. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility – Hazardous Substance Sites

The City of Valley, as an eligible entity, meets the requirement of the Bona Fide Prospective Purchaser (BFPP) liability protection per CERCLA §101(40). Supporting information for each of the applicable sections is provided below.

iii. Landowner Liability Protections From CERCLA Liability

(a) Information on the Property Acquisition, (Items i-v): The City of Valley (owner) acquired fee simple title of the property by negotiated purchase on August 18, 2018. The property was purchased from EAC Enterprises, LLC (doing business as Adams Group), who is an Alabama Limited Liability Company whose address is 995 Starr Court, Auburn, Alabama 36830. The City is the sole owner of the property. The City has had no familial, contractual, corporate, or financial relationships or affiliations with any prior owners or operators (or potentially responsible parties) of the property, including the person or entity from which the City acquired the property.

(b) Pre-Purchase Inquiry, (Items i-iii): The City of Valley conducted all appropriate inquiries (AAI) prior to acquiring the property. A Phase I Environmental Site Assessment (ESA) using ASTM E1527-13 was conducted within one year prior to the date the property was acquired, with a report date of July 13, 2018 (35 days prior to purchase by the City). The City of Valley contracted the engineering firm of Harris Gray LLC and their subconsultant, Geotechnical & Environmental Consultants, Inc. to conduct the Phase I. The report was certified by Kevin Strumpler, a Professional Geologist, and Jason Cooper, a Professional Engineer. Resumes included with the Phase I ESA report indicate that these individuals are qualified environmental professionals. A Phase II ESA was also conducted on the site by these same

firms, with a report date of August 3, 2018. The Phase II identified the presence of hazardous substances and petroleum at the site.

(c) Timing and/or Contribution toward Hazardous Substance Disposal: All disposal of hazardous substances at the site occurred before the City of Valley acquired the property. The City of Valley has not caused or contributed to any releases of hazardous substances at the site and has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

(d) Post-Acquisition Uses: Since taking ownership of the site, the City has not leased the site or allowed others to use it for any purpose. The only activities undertaken by Valley since the date of acquisition is minor segregation of wood and metal from the demolition rubble.

(e) Continuing Obligations: The City has exercised appropriate care by taking reasonable steps to prevent trespassing on the site to limit exposure to hazardous substances at the site. Patrols are conducted to prevent trespassing. Petroleum impacted soils are located beneath the surface and covered with concrete rubble, preventing exposure. Groundwater is not impacted, so this migration pathway is not a concern. The City will comply with any land use restrictions and will not impede the effectiveness or integrity of any institutional controls. The owner has and will provide full cooperation, assistances, and access to authorized persons, including staff from ADEM and EPA. The City will comply with any CERCLA information requests and administrative subpoenas, and will provide all legally required notices with respect to the discovery or release of any hazardous substances found at the site. The owner has not and will not impede performance of a response action or nature resource restoration, and desires to clean up the site.

b. Property Ownership Eligibility – Petroleum Sites

The City of Valley has received a petroleum eligibility determination from ADEM, dated January 29, 2019 (see attached letter). A small area of petroleum impact was found in shallow soils near a former oil storage area during the August 2018 Phase II ESA:

i. INFORMATION REQUIRED FOR A PETROLEUM SITE ELIGIBILITY DETERMINATION

- (1) Current and Immediate Past Owners: The City of Valley owns the site. The immediate past owner was EAC Enterprises, LLC. EAC purchased the site to reclaim building materials from the former mill buildings.
- (2) Acquisition of Site: The City of Valley purchased the site from EAC Enterprises, LLC on August 18, 2018.
- (3) No Responsible Party for the Site: The City of Valley (i) never dispensed or disposed of petroleum or petroleum product contamination, or exacerbated the existing petroleum contamination at the site; (ii) never owned the site when any dispensing or disposal of petroleum (by others) took place; and (iii) took reasonable steps with regard to

contamination at the site. Since the soil impact was minor, found below the surface to a maximum depth of 5 feet, limited in extent, and groundwater was not present, no emergency steps or removal actions were needed. It is our belief that these same responses would be offered by EAC, the immediate past owner from whom we purchased the site, since they only owned it since 2016 and never operated the facility.

- (4) Cleaned Up by a Person Not Potentially Liable: The City of Valley (the applicant) never dispensed or disposed of petroleum or petroleum product, or exacerbated the existing petroleum contamination at the site, and as stated in item 4 above, no response actions were needed with regard to the contamination at the site.
- (5) Judgments, Orders, or Third-Party Suits: To our knowledge, no responsible party is identified for the site, through either:
 - (a) a judgment rendered in a court of law or an administrative order that would require any person to assess, investigate, or clean up the site; or
 - (b) an enforcement action by federal or state authorities against any party that would require any person to assess, investigate, or clean up the site; or
 - (c) a citizen suit, contribution action, or other third-party claim brought against the current or immediate past owner, that would, if successful, require the assessment, investigation, or cleanup of the site.
- (6) Subject to RCRA: To our knowledge, the site is not subject to any order under § 9003(h) of the Solid Waste Disposal Act.
- (7) Financial Viability of Responsible Parties: This item is not applicable, since no responsible party is identified in (3) or (4) above, and therefore, the site should be eligible for EPA brownfield grant funding.

11. Cleanup Authority and Oversight Structure:

a. Describe how the City will oversee the cleanup of this site. The City has significant experience with retaining technical expertise to assist with complex projects, and the management structure in place to ensure project success. The Planning Director will serve as Grant Manager, and Valley has obtained technical assistance from an Environmental Professional (EP) to develop a draft Analysis of Brownfield Cleanup Alternatives (ABCA) that presents several alternatives to clean up the site. Numerous site visits were made to study the challenges at the former mill site. Meetings were held with the ADEM Solid Waste Division and the Redevelopment Section to discuss site conditions and alternatives for cleanup. ADEM indicated that they would work with the City to help find a solution that fits the planned redevelopment of the site and the limited City resources. An onsite meeting was also held with an environmental construction contractor experienced with similar large scale projects to develop conceptual cost estimates. The alternative deemed to be the most implementable and effective was excavation of the limited area of PAH-impacted soils; movement of inert demolition wastes to the low and sloped areas at the site, and offsite disposal of waste containing ACM and LBP at a Subtitle D landfill. The following actions would be conducted to implement this alternative:

- Continued segregation of wood and metal wastes from the existing piles.
- Entry of the site into the ADEM Voluntary Cleanup Program (VCP). Cleanup planning documents will include a waste segregation sampling plan that will be approved by the ADEM Solid Waste Division. The segregation sampling plan will augment the previous Phase II sampling conducted at the site to further segregate those waste piles containing ACM and LBP from those that should be classified as inert materials. **Note:** Valley will pay for this additional sampling using their own funds, or will get assistance from the ADEM Redevelopment Section, and costs will not be applied against the cleanup grant funds.
- Preparation of bid documents for the proposed waste removal effort and solicitation of bids from qualified contractors.
- Filling of low areas on the east side of the site with those materials deemed to be inert (no painted wood, metal, or materials that contain ACM or LBP).
- Transportation of wastes that cannot be used as onsite fill (i.e., those containing ACM or LBP) to an offsite approved Subtitle D lined landfill for disposal.
- Excavation and offsite disposal of shallow PAH-impacted soils from the former oil storage area.
- Covering of the site with clean, imported fill and a layer of topsoil, and reseeded with grass.

Excavation of demolition wastes is a common method of cleanup, and the City is confident in the implementability and effectiveness of the proposed cleanup method as presented in the ABCA, as well as having the authority and oversight structure in place to manage the project.

b. Cleanup response activities: Since the City already owns the property, access to adjacent properties will not be required. There is enough distance between the demolition rubble and the adjacent properties that offsite monitoring will not likely be required during removal actions. However, a community meeting will be held prior to project kickoff to inform area residents of the construction activities and to address any concerns that may be raised. A public meeting has already been held to announce the project.

12. Community Notification:

- a. Draft Analysis of Brownfield Cleanup Alternatives (ABCA): A copy of the draft grant application, along with a draft ABCA was provided for review at the January 22, 2019 public meeting, as well as instructions on where the documents can be reviewed by others prior to submittal of the proposal.
- b. Community Notification Ad: The City provided public notification that met all EPA requirements regarding intent to apply for this cleanup grant on January 16, 2019 prior to the January 22, 2019 public meeting. The notice was posted in several locations at City Hall, and on the City Facebook page. The community notification informed residents on the location of the meeting, the availability of the ABCA and draft proposal, and how it can be viewed. Proof of this notification is attached.
- c. Public Meeting: The public meeting was held on January 22, 2019 at 6 p.m. at City Hall to receive and address public comments. A copy of the draft grant application, along with a draft

ABCA was provided for review at this meeting, as well as instructions on where the documents can be reviewed by others prior to submittal of the proposal.

- d. Community Notification Documents: Proof of the advertisement for the community meeting, meeting notes, sign-in sheet, and questions asked and responses, and a copy of the draft ABCA are attached. No written questions were received.

13. Statutory Cost Share: Valley understands that we are required to provide a 20% cost share for the total federal cleanup funds awarded in the form of a contribution of money, labor, material, or services from a non-federal source. Total clean-up costs are estimated at \$600,000. Valley is requesting \$500,000 from the EPA for the cleanup grant, and the City is committing \$100,000 to meet the required 20% cost share. This cost share will be met by providing the following:

- In-kind services, consisting of:
 - City equipment operator (\$30/hr x 700 hrs. = \$21,000)
 - City equipment (\$55/hr x 700 hrs. = \$38,500)
- Payment of \$40,500 to ADEM for entry into the Voluntary Cleanup Program.

These items are all eligible to meet the required \$100,000 cost share. A hardship waiver for the cost share is not being requested.

Proof of Site Ownership

STATE OF ALABAMA
CHAMBERS COUNTY

KNOW ALL MEN BY THESE PRESENTS, That for and in consideration of the sum of Ten Dollars (\$10.00), and other good and valuable considerations, to the undersigned Grantor in hand paid by the Grantee, the receipt and sufficiency of which are hereby acknowledged, Grantor **EAC ENTERPRISES, LLC doing business as Adams Group** an Alabama Limited Liability Company created and existing under and by virtue of the laws of the State of Alabama and duly authorized to transact business in the State of Alabama, whose address is 995 Starr Court, Auburn, Alabama 36830 does hereby grant, bargain, sell and convey unto Grantee the **CITY OF VALLEY, ALABAMA** the following property in CHAMBERS County, Alabama:

Commencing at the Northwest corner of Lot No. 1, Block 39, Fairfax Mill Village, said point being the POINT OF BEGINNING; thence South 35 degrees 11 minutes 37 seconds East for 182.53 feet to a point on the ROW of Fairfax Boulevard; thence along said ROW South 62 degrees 26 minutes 34 seconds West for 82.31 feet; thence continue South 84 degrees 12 minutes 29 seconds West for 906.61 feet; thence along the following chords along the curved ROW of Fairfax Boulevard: North 68 degrees 12 minutes 57 seconds West for 191.57 feet; North 17 degrees 09 minutes 45 seconds West for 169.55 feet; North 35 degrees 00 minutes 25 seconds East for 188.67 feet; thence along the ROW of Fairfax Boulevard North 59 degrees 32 minutes 45 seconds East for 70.97 feet; thence North 52 degrees 26 minutes 38 seconds East for 98.65 feet; thence North 43 degrees 49 minutes 38 seconds East for 107.83 feet; thence North 37 degrees 30 minutes 38 seconds East for 165.92 feet; thence North 39 degrees 35 minutes 38 seconds East for 23.1 feet; thence North 37 degrees 20 minutes 24 seconds East for 604.03 feet to the intersection of the ROW of Fairfax Boulevard and LaFayette Street; thence along the ROW of LaFayette Street South 52 degrees 07 minutes 05 seconds East for 781.98 feet; thence continue along the ROW of LaFayette Street South 52 degrees 07 minutes 32 seconds East for 19.45 feet; thence continuing along said ROW line South 08 degrees 23 minutes 17 seconds East for 167.57 feet; thence leaving said ROW South 55 degrees 02 minutes 16 seconds West for 270.01 feet; thence South 54 degrees 58 minutes 37 seconds West for 173.94 feet to the POINT OF BEGINNING, said described tract containing 22.463 acres more or less.

LESS AND EXCEPT the following described parcel: Commencing at the Northwest corner of Lot No. 1, Block 39, Fairfax Mill Village; thence South 35 degrees 11 minutes 37 seconds East for 182.53 feet to a point on the ROW of Fairfax Boulevard; thence along said ROW South 62 degrees 26 minutes 34 seconds West for 82.31 feet; thence leaving said ROW North 58 degrees 32 minutes 16 seconds East for 56.85 feet to the POINT OF BEGINNING; thence South 84 degrees 17 minutes 34 seconds West for 105.01 feet; thence North 05 degrees 41 minutes 31 seconds for 35 feet; thence North 31 degrees 26 minutes 29 seconds East for 18.85 feet; thence North 84 degrees 18 minutes 29 seconds East for 93.63 feet; thence South 05 degrees 41 minutes 31 seconds East for 50 feet to the Point of Beginning, said tract containing 0.119 acre more or less.

The above described property is shown on plat of survey recorded in Plat Cabinet F, Slide 93 in the office of the Judge of Probate of Chambers County, Alabama. This being the same property described in Document 2016-2811, Document 2014-3167, Document 2014-3166 and Document 2010-1397.

LESS AND EXCEPT those parcels which were conveyed to the Chattahoochee Humane Society, Inc. by deeds recorded in Document 2015-1503 and Document 2016-2810, that

portion conveyed to the Chambers County Board of Education by deed recorded in Document 2018-140 and that portion to East Alabama Water, Sewer and Fire Protection District by deed recorded in Document 2018-235.

Address: 205 Boulevard, Valley, Alabama 36854

Purchase price: \$124,000- Tax Parcel 12-17-06-24-4-001-016.000 (No tax due/governmental entity)

TO HAVE AND TO HOLD unto Grantee, its successors and assigns in fee simple.

And Grantor does for itself and for its successors, covenant with Grantee, its successor and assigns, that it is lawfully seized of the property in fee simple, that the property is free from all liens and encumbrances, and that it have a good right to sell and convey the same as aforesaid; that it will, and its successors shall forever warrant and defend the same unto Grantee, its successors and assigns against the lawful claims of all persons.

IN WITNESS WHEREOF, Grantor has caused this deed to be executed by the appropriate officer this the date set forth below.



Aaron Adams, sole member of
**EAC ENTERPRISES, LLC, doing
business as Adams Group**

STATE OF ALABAMA
CHAMBERS COUNTY

Before me the undersigned authority, a Notary Public in and for said State and County, personally appeared Hugh O. Dicks, whose name is signed to the foregoing as Managing General Partner for **EAC ENTERPRISES LLC, doing business as Adams Group**, who has identified himself to me, and acknowledged before me on this day that being fully informed of the contents thereof, he executed the same voluntarily on this date with full power to bind his principal.

Given under my hand and seal this the 24th day of August, 2018.


NOTARY PUBLIC

My commission expires: 6-17-19

Prepared by:
John Ben Jones, Attorney at Law
P.O. Box 386, Lanett, AL 36863

Grantee's Name and address:
CITY OF VALLEY, ALABAMA, P.O. Box 186, Valley, Alabama 36854

ADEM Petroleum Determination Letter



Alabama Department of Environmental Management
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

January 29, 2019

Mr. Travis Carter
Director of Planning and Development
City of Valley
Post Office Box 186
Valley, Alabama 36854

Re: Petroleum Site Eligibility Determination
Former Fairfax Textile Mill
Valley, Alabama

Dear Mr. Carter:

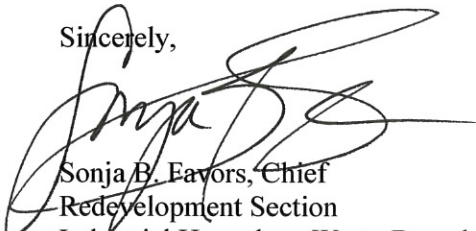
On January 28, 2019, the Alabama Department of Environmental Management received a "Petroleum Site Eligibility Determination" request prepared by the City of Valley for the Former Fairfax Textile Mill site. In order for a site to be eligible for Brownfields Grant funding, the following criteria must be met:

- There can be no viable responsible party,
- The applicant cannot be potentially liable for cleaning up the site, and
- The site must not be subject to a RCRA corrective action order.

Based on our review of the information provided by the City of Valley and a review of our files, it appears that the above-referenced site and the City of Valley meet the criteria of eligibility for the Brownfields Cleanup Grant funding.

We wish you and the residents of the City of Valley success in pursuit of these funds. Please let us know if we can be of further assistance.

Sincerely,



Sonja B. Eavors, Chief
Redevelopment Section
Industrial Hazardous Waste Branch

SBF/AME

Cc: Mike McCown via email, mike.mccown@ppmco.com



Community Notification Documents (*proof of advertisement, public meeting minutes, articles, sign-in Sheet, draft ABCA*)

Look for **One Click Digital**
at <http://chamberscountylibrary.org>

City of Valley – Former Fairfax Mill Site

NOTICE

The City of Valley, AL is considering submitting a USEPA Brownfields Cleanup Grant proposal to remove demolition rubble from the former Fairfax Mill located at 201 Boulevard, Valley, AL 36584. A public meeting will be held at 6:00 EST on January 22nd at City Hall to discuss the grant application and solicit public comments on the proposal. A draft proposal with an Analysis of Brownfields Cleanup Alternatives will be available at the meeting, and for public review at the Planning and Development office located in City Hall after the meeting.

STATE OF ALABAMA
CITY OF VALLEY
PLANNING AND DEVELOPMENT
VALLEY, ALABAMA

BID FORM

Sealed bids will be received for a 1998 GMC 2500 with utility bed by Travis Carter at Valley City Hall **starting Thursday, January 17nd through Thursday the 7th of February at 1:00pm EST**, and then opened at 1:30pm EST at Valley City Hall.

The City reserves the right to accept or reject all bids.

Bids should be placed in a sealed envelope with “SEALED BID” and 1998 GMC truck clearly marked on the envelope.

Signature on bid must be in ink. Bids made out in pencil will not be accepted.

Vehicle is being sold as is, no warranty.

Interested parties can view the vehicle at the Valley Public Works building located at 5220 Fairfax Bypass Monday through Thursday 8:30am till 4:30pm – contact Jud Hay at 334-756-5236

Minimum bid is \$500

1998 GMC 2500 with utility bed

Bid Price of \$ _____

Bidder Name: _____

Bidder Address: _____

Bidder Phone Number: _____

Bidder Signature: _____

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Drama Therapy & Substance Abuse Professionals

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- Trauma Informed
- Crisis Intervention
- Individual Therapy
- Group Therapy
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- Peer Support
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812 57 Ave, West Point, GA 31857
Local call to First University Building
Open Monday - Friday 9:00am - 5:00pm
Tel: 812-57-1714
Office: 706-773-1714
Fax: 706-773-1714

LOOK BENEATH THE SURFACE

HUMAN TRAFFICKING IS MODERN-DAY SLAVERY

A victim of trafficking may look like many of the people you see every day.

Ask the right questions and look for clues. You are vital because you may be the only person who can help.

There are safe housing, legal and interpretation services.

If you think someone is a victim, for more information about how to help, visit www.humantrafficking.org

RU RECOVERY PROGRAM

Breaking the Chains of Addiction

RU is a 12-step based, Christ-centered recovery program designed to restore, renew, and restore those in addiction to substances with the power of the Holy Spirit. RU is held only in small groups.

Call: 706-773-1714, 2:00-4:00, 4:00-6:00, 6:00-8:00, 8:00-10:00

"Only the TRUTH makes Free" Jn. 8:32
Meetings Every Friday 7-9 PM

EAST AL. WEST GA. WIDOWS

Valentine's Banquet

SAT. FEB. 16TH 2019
12 - 2 PM CST

All Widows Invited To An Afternoon Of Fun, Food Fellowship, Gifts, Music, Devotion, Valet Parking and Surprises!

Special Speaker: Marlene Craft

From Widow's Link Alabaster AL

4th Annual Widows Banquet
Hosted by The Bridge Church
1001 Lee Rd 355, Conley, GA 30125
RSVP TODAY: 334.742.0144

Game Day for Grown Ups

LAFAYETTE
Wed., 1 - 4 pm
Central

BRADSHAW
Wed., 1 - 4 pm
Eastern
Begins Jan. 16

EVERY WEDNESDAY
Games, cards, dominoes, more. Drinks provided.
Bring a snack to share.

Chambers County Library Cobb Memorial Archives

DOGGONE GOOD!

Download life-quality eBooks from our library—24 hours a week!

Look for One Click Digital at <http://chamberscountylibrary.org>

City of Valley - Former Fairfax Mill Site

Public Hearing

On the proposed development of the former Fairfax Mill site, located at the intersection of Highway 1 and Highway 20, in the City of Valley, Georgia.

The City of Valley is currently reviewing the proposed development and is seeking public input. The public hearing will be held on Wednesday, February 14, 2019, at 7:00 PM, at the City of Valley Administration Center, 1000 Valley Road, Valley, Georgia 30482.

For more information, please contact the City of Valley Planning Department at 706-773-1714.

Tutors Needed

In 2018, 20% of the students in Chambers County (2 out of 10 percent) could not read a 1st grade level. Over a 10% improvement is needed in reading.

2018-2019 - more is better - all of it!

We are a nonprofit organization looking for students who are willing to work with adult tutors in Chambers County.

We provide free training, materials, and all the resources you will need.

You provide the desire to help and the ability to connect to new lives.

For more information, contact: info@rebootchambers.org or call 706-773-1714

EL RIO GRANDE LANEY CRUISE

On Saturday, April 27, 2019, the El Rio Grande Laney Cruise will depart from the El Rio Grande Mexican Restaurant in Savannah, Georgia.

Please contact Billy Humphrey at billyh@elriogrande.com for more information.

Everyone is welcome!

Cruise is free.

Cars, Trucks, Bikes, Any Make or Model.

Prizes will be given for participation and this will be a year-round event.

NO ALCOHOL OR LOUD MUSIC.

Thanks for your support and Thanks to El Rio Grande Mexican Restaurant.

YOUR CAREER STARTS HERE.

Call for more information: 706-773-1714

ALLER UNIVERSAL

PARENTS AS TEACHERS PROMOTES

Parents as Teachers (PAT) is a national organization that provides free, evidence-based home visiting programs to parents of young children.

Parents as Teachers promotes the positive parenting practices that are essential for a child's healthy development.

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Parents as Teachers promotes the positive parenting practices that are essential for a child's healthy development.

COMMUNITY & NON-PROFIT ORGANIZATIONS ONLY MAY POST ON THIS BOARD

(Please bring your information to circulation desk and we will post)

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(See Back for More Details)

CALL US TO REGISTER @ (334) 749-8480

link+care

Link+Care is a national organization that provides free, evidence-based home visiting programs to parents of young children.

Link+Care promotes the positive parenting practices that are essential for a child's healthy development.

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Link+Care provides free, evidence-based home visiting programs to parents of young children.

Link+Care promotes the positive parenting practices that are essential for a child's healthy development.

Kids and Kin Program

What is the Kids and Kin Program?

The Kids and Kin Program is a national organization that provides free, evidence-based home visiting programs to parents of young children.

The Kids and Kin Program promotes the positive parenting practices that are essential for a child's healthy development.

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The Kids and Kin Program promotes the positive parenting practices that are essential for a child's healthy development.

MENTOR

Make a Difference. Become a Foster Parent.

Valley and Laney Youth Center

Call for more information: 706-773-1714

THEY PROTECTED US. NOW IT'S OUR TURN.

VETERAN

MedReturn

Make EVERY Day a Drug Take-Back Day!

Chambers County Sheriff's Department
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LaFayette, Alabama 36042

PEANUTS! GET YOUR PEANUTS!!!

PLEASE SUPPORT THE VALLEY KIWANS CLUB BY PURCHASING ALABAMA GROWN PEANUTS!

\$7 PER BAG

ASK AT THE CIRCULATION DESK

City of Valley – Former Fairfax Mill Site

City of Valley, AL is considering submitting a USEPA Brownfields Cleanup Grant proposal to remove hazardous waste from the former Fairfax Mill located at 201 Boulevard, Valley, AL 36584. A public meeting will be held at 6:00 EST on January 22nd at City Hall to discuss the grant application and solicit public comments on the proposal. A draft proposal with an Analysis of Brownfields Cleanup Alternatives will be available at the meeting, and for public review at the Planning and Development office located in City Hall during the meeting.

Valley City Hall will be closed on
Monday, January 21st 2019 in
observance of Martin Luther
King, Jr. Holiday. We will
reopen on Tuesday, January
22nd at 8 a.m.

STATE OF ALABAMA
CITY OF VALLEY
PLANNING AND DEVELOPMENT
VALLEY, ALABAMA

BID FORM

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Bids should be placed in a sealed envelope with "SEALED BID" and 1998 GMC 2500 marked on the envelope.

Signature on bid must be in ink. Bids made out in pencil will not be accepted.

Vehicle is being sold as is, no warranty.

Interested parties can view the vehicle at the Valley Public Works building located at Fairfax Bypass Monday through Thursday 8:30am till 4:30pm – contact Jud Haas for more information.

Minimum bid is \$500

1998 GMC 2500 with utility bed

Bid Price of \$ _____

Bidder Name: _____

Bidder Address: _____

Bidder Phone Number: _____

Bidder Signature: _____

NO COURT HERE

PLEASE CHECK

**THE LANETT ANNEX CIRCUIT
CLERK OFFICE**

@ (334) 644-7068

OR

THE LAFAYETTE COURT HOUSE

@ (334) 642.6538

Want great quality of life? These are the best cities to live in every state across US

Samuel Stebbins and Grant Suneson, 24/7 Wall Street Published 6:20 a.m. ET Jan. 4, 2019 | Updated 10:03 a.m. ET Jan. 4, 2019

There are nearly 20,000 villages, towns and cities across the 50 states, and not all of them are equally conducive to the well-being of those who live there.

While quality of life is subject to a range of factors – close relationships and personal health being among the most important – the local community and environment can also have a meaningful impact.

When it comes to choosing a place to call home, everyone has their own priorities and subjective tastes. Still, there are specific attributes some communities share that are almost universally desirable: safe streets, a strong economy, affordability and a range of entertainment options, to name a few.

24/7 Wall St. created a weighted index of over two dozen measures to identify the best city to live in each state. We considered all boroughs, census designated places, cities, towns and villages with at least 8,000 residents.

More: [25 industries experiencing the fastest growth in the US economy](#)

More: [25 cities that lost the most jobs in 2018](#)

More: [These are the most expensive zip codes in the US this year](#)

These cities tend to have much in common beyond the index components upon which they were ranked. For one, these communities are often within commuting distance of a major metropolitan area. This is no coincidence, as close proximity to a major city provides residents with access to more job opportunities, which in turn can help lower unemployment and improve financial security.

The best cities to live in include ones just outside of Atlanta, Boston, Chicago, Los Angeles, New York City, Oklahoma City, Pittsburgh and Washington.

1. Valley, Alabama

- Population: 9,439
- 5 yr. population change: -0.8 percent
- Median home value: \$82,900
- Median household income: \$39,387

The majority of the cities on this list are relatively wealthy. Valley, Alabama, is an exception. The typical household in Valley earns just \$39,387 a year, about \$5,000 less than the typical Alabama household. Still, serious financial hardship is less common in Valley than in Alabama as a whole as 15.7 percent of area residents live below the poverty line, well below the 18.4 percent state poverty rate. Valley residents also benefit from a low cost of living as goods and services are about 6 percent less expensive in the city than they are nationwide on average.

Valley is a pilot city for the Alabama Communities of Excellence program, a non-profit that partners with governments, businesses, and universities to prepare participating communities for a more vibrant future.

EMS & POLICE DEPT 

FOB JAMES DRIVE

General Carbonite Security Details Previous Versions

Property	Value
Description	
Title	
Subject	
Rating	☆☆☆☆☆
Tags	
Comments	
Origin	
Authors	
Date taken	1/16/2019 3:55 PM
Program name	N910TUVU2EQI2
Date acquired	
Copyright	
Image	
Image ID	H16USHH04SA
Dimensions	2988 x 5312
Width	2988 pixels
Height	5312 pixels
Horizontal resolution	72 dpi
Vertical resolution	72 dpi

[Remove Properties and Personal Information](#)

Attached



Valley Public Notice Brownfield Cleanup Fairfax Mill.docx
13 KB



20190117_080124.jpg
5 MB



20190117_080117.jpg
5 MB

From: Travis Carter [<mailto:TCarter@CityOfValley.com>]

Sent: Wednesday, January 16, 2019 9:24 AM

To: 'Laurie Blount' <blount@cityofvalley.com>

Subject: Fairfax Mill site

Laurie,

Can you also put the attached on your Facebook page.

Thanks

Travis L. Carter
Director of Planning and Development
Zoning Administrator
City of Valley
P.O. 186
20 Fob James Drive
Valley, Alabama 36854
334-756-5249

Sign-in Sheet

Brownfields Community Outreach Meeting

Former Fairfax Mill- Valley, AL

6:00 pm

January 22, 2019

[illegible]

Public Meeting Minutes-City of Valley,
AL EPA Brownfields Cleanup Grant-
Fairfax Mill

Meeting Minutes
Page 1 of 2

DATE & TIME:	1-22-2019 6pm-7pm
LOCATION OF MEETING:	City of Valley, Alabama Council Chambers
MINUTES TRANSCRIBER:	Mike McCown

PRESENTERS:

#	PERSON	REPRESENTING	FUNCTION
1.	Mike McCown	PPM Consultants	Assisting with Clean up Grant
2.	Travis Carter	City of Valley, Alabama	Planning Director/Grant Manager

ITEM	DESCRIPTION OF DISCUSSION	PERSON LEADING DISCUSSION
1.	Introduced the Project Team; what brownfields are history of the mill site, and desire to remove the demolition rubble to create greenspace.	McCown
2.	Discussed contaminants present in the rubble and the soil.	McCown
3.	Discussed EPA Brownfields program, plans to submit cleanup application, and process.	McCown
4.	Discussed need for community input on redevelopment, thoughts on greenspace, etc.	Carter
5.	Answered questions posed to the Project Team by attendees.	Carter/McCown
6.	Interviewed by local media reporter.	McCown

PUBLIC MEETING QUESTIONS AND RESPONSES:

1. **What is a ‘greenspace’?** Responded with a description of green space, as well as examples of different types of green space applications other cities have used.
 2. **Does the 500K grant amount include the 20% of the city input?** Responded with no, the city will have to contribute the 20% (100K) above the grant amount.
 3. **Can the community go ahead and work on cleaning up the site areas that simply have debris, before the grant is awarded, and have it count as “in kind” credit?** Responded that we will have to check with EPA to determine this, and if allowed, will apply resources already expended to the in-kind contribution.
 4. **When you are talking of bringing non-contaminated debris to the back, to fill the lower spots, are you referring to the old pond areas?** Responded with yes, and there will need to be some topsoil brought in from offsite as well to be able to plant grass.
-

5. **Where did the 500K number come from?** Responded that this was the max amount an entity could receive under the current cleanup grant guidelines. But may can apply for additional grants in the future.
6. **Will they give a portion of the grant if the money in the program is running low?** Responded that no, they will award the full amount requested if the funds are available and the grant scores highly enough.
7. **What is this area zoned now?** Responded that itt is not zoned at this time.

END

Former Fairfax Mill Brownfield Cleanup

Community Outreach Meeting
January 22, 2019



What is a Brownfield?

- Properties formerly used for industrial or commercial purposes that could have used hazardous substances or petroleum products.
- Can impact soil and groundwater with petroleum or other hazardous substances.
- Examples:











FROM HISTORIC FAIRFAX MILL

VALLEY, ALABAMA



Fairfax Mill Site History

- Textile Mill: 1915-2004
- Company buys site in 2015 to salvage marketable materials
- Asbestos removed prior to demo
- Fire/demolition
- Estimated 17,000 tons of rubble present



Fairfax Mill Village
August 23rd, 2015



Fairfax Mill Site History

- City purchases site in 2018
- Conducts environmental assessments
- Asbestos and lead-based paint found in some of the materials
- Petroleum-impacted soil in former oil storage area
- Begins limited segregation of metal/wood





Photo 1:
8-2-2018

Pieces of wood with lead base paint



Photo 2:
8-2-2018

Paint off of concrete containing lead based paint.

City Seeks EPA Brownfields Cleanup Grant

- \$500,000, plus 20% city cost share
- Remove demolition rubble
- Remove petroleum-impacted soils in former oil storage area
- Grant due January 31, 2019

Cleanup Alternatives

- No action
- Permit site as Construction & Demolition Landfill
- Transport all materials to a lined landfill
- Use inert materials as on-site fill, transport remainder to landfill

Proposed Redevelopment

- Plant grass, trees, create greenspace!



Questions?

Draft ABCA

DRAFT ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES

**CITY OF VALLEY
FORMER FAIRFAX TEXTILE MILL SITE
FAIRFAX MILL VILLAGE
201 BOULEVARD
VALLEY, ALABAMA 36854**

JANUARY 21, 2019

DRAFT

DRAFT ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES

**FORMER FAIRFAX TEXTILE MILL
201 BOULEVARD
FAIRFAX MILL VILLAGE
VALLEY, ALABAMA 36854**

PREPARED FOR:



**CITY OF VALLEY
20 FOB JAMES DRIVE
P.O. BOX 186
VALLEY, AL 36854**

PREPARED BY:



**5555 BANKHEAD HIGHWAY
BIRMINGHAM, ALABAMA 35210
(205)836-5650**

JANUARY 21, 2019

PREPARED BY

REVIEWED BY

**MICHAEL D. MCCOWN, P.G.
PROJECT MANAGER**

**GREGORY STOVER, P.G.
SENIOR GEOLOGIST**

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APPENDICES

Appendix A – Approximate Location of Demolition Rubble Piles Requiring Removal

Appendix B – Key Excerpts from GEC Phase II ESA

1.0 INTRODUCTION & BACKGROUND

This document presents a draft Analysis of Brownfield Cleanup Alternatives (ABCA) for cleanup of hazardous substances identified in shallow soils and in demolition rubble at the former Fairfax Mill, Fairfax Mill Village, Valley, Alabama. The City of Valley has recently acquired the property after conducting “All Appropriate Inquiry” and is seeking an Environmental Protection Agency (EPA) Brownfield Cleanup Grant to address the presence of hazardous substances at the site prior to redevelopment. This draft ABCA has been prepared to provide summary information on the type and quantity of hazardous substances present at the site, alternatives for remediation of these substances, and recommendations for an alternative deemed to be most feasible to protect human health and the environment and to accomplish Valley’s goal for site redevelopment. Notice of this document has been published and made available for public comment in accordance with EPA Brownfield Cleanup Grant application requirements. Detailed information on the proposed project is provided in the draft brownfield cleanup grant application also available for public review.

1.1 SITE DESCRIPTION AND HISTORY

The target property consists of approximately 16.28 acres of land that was formerly occupied by the Fairfax Textile Mill. The site is located in the center of the community known as the Fairfax Mill Village and is bounded by River Road, Boulevard Road, and the former Lafayette Street. The most descriptive address from the last time of operation is WestPoint Stevens Fairfax Mill, 201 Boulevard, Valley, Alabama 36854. The site is bordered by residential properties, Fairfax Elementary School, churches, and the newly constructed Valley Fire Station Training Facility.

The mill was constructed in 1915 and operated in various configurations until permanent closure in 2004 under the ownership of WestPoint Stevens. The most recent configuration included 18 buildings and the last operations included slashing, sizing, warping, dyeing, as well as warehousing/storage for the nearby Lanier Carter Mill also operated by WestPoint. In addition to the production and warehousing operations discussed above, the Mill also included a raw process water treatment plant, a wastewater pretreatment works, a steam boiler, two concrete-lined ponds used as part of the raw process water supply system, and a backwash basin.

The only structures now present at the site are concrete foundations, as all the 18 buildings previously located at the site have been demolished by the previous owner, EAC

Enterprises, LLC. EAC purchased the property in 2016 to recover marketable building materials prior to demolition. An asbestos survey and abatement of friable asbestos-containing materials (ACM) was reportedly conducted prior to demolition. EAC's attempts at controlled on-site burning of some of the debris resulted in a large fire in the main mill building. The fire was extinguished, but a large portion of the building was damaged and the remainder of the building was torn down. The site contains a significant volume of demolition debris, including concrete, wood, asphalt, metal, soil, and other rubble. These materials have been partially segregated, but a Phase II Environmental Site Assessment (ESA) conducted on the property revealed the presence of ACM and lead-based paint (LBP) in portions of the demolition rubble and elevated polynuclear aromatic hydrocarbons (PAH) in shallow soils in one area. Since purchasing the property in 2018, the City has been segregating wood and metallic wastes from the demolition rubble using their own equipment and personnel. However, additional work is needed to further segregate this material from the remaining rubble.

Demolition wastes are regulated by the Alabama Department of Environmental Management (ADEM), who has rules regarding the disposal of wastes containing ACM and LBP. An estimated 17,000 tons of demolition rubble is present, and the site is in significant need of cleanup. In addition, the concrete-lined basin located at the site is filled with water and demolition debris, and also needs cleanup. The property is not fenced and area children often play at the site. The presence of the waste materials represents an environmental and safety threat to the community. The City of Valley purchased the site in 2018 as the first step in finding a solution to the cleanup. Phase I and II ESAs were conducted on the site prior to acquisition to satisfy all appropriate inquiry and *bona fide prospective purchaser* requirements. Award of EPA brownfield cleanup funding will help the City return the site to beneficial reuse, which is currently targeted as greenspace. An aerial view of the site from October 2018 is shown in **Appendix A, Approximate Location of Demolition Rubble Piles Requiring Removal.**

1.2 SUMMARY OF PREVIOUS SITE INVESTIGATIONS

Several environmental investigations have been conducted at the site to evaluate environmental conditions. A summary of findings from each of these investigations is provided below:

Phase I Environmental Site Assessment, July 13, 2018. Geotechnical & Environmental Consultants, Inc. (GEC) in partnership with Harris Gray, LLC, conducted a Phase I ESA of the property for the City in conformance with ASTM International Standard Practice E

1527-13. The Phase I ESA reported the following recognized environmental conditions (RECs) in connection with the property:

- The operation as a cotton mill at the subject property is deemed to be a REC, due to the environmental issues historically found at these types of facilities.
- The former use/storage of petroleum products and other potential hazardous materials and the past releases of chemicals to the environment are deemed to be a REC.
- The vapor encroachment condition is not currently deemed to be a REC, due to the current use of the site (with no permanent onsite structures), and the proposed use of the site as a greenspace. If it is determined that structures will be built at the site, then this opinion will need to be re-evaluated at that time.
- The dumping and/or landfilling of the demolition debris at the site is a regulatory issue and due to the age of the debris and possibility of LBP or ACM in the debris, this is deemed to be a REC.

Phase II Environmental Site Assessment, August 3, 2018. Based on the RECs identified in the Phase I ESA, a Phase II ESA was conducted by GEC prior to Valley's purchase of the property. The Phase II ESA included the installation of 14 soil borings and three temporary monitoring wells to facilitate the sampling of soil and groundwater, and collection of samples from the demolition rubble to determine the presence of ACM and LBP. Sampling locations were based on GEC's review of historical mill maps and the findings from a Phase I ESA conducted in 2004. The following scope of work was conducted:

- Boring B-1 was installed in the proximity of the former 50,000-gallon aboveground storage tank (AST).
- Boring B-2 was installed down-gradient of former building No. 20, which was used as storage for 55-gallon drums of sodium hydrosulfite.
- Boring B-3 was installed in the general area of a former 550-gallon underground storage tank (UST).
- Borings B-4 and B-9 was installed near storage buildings on the adjacent property.
- Boring B-5 was installed in the general area of the former coal pile on the eastern portion of the property.
- Borings B-6 and B-14 were installed in the area of former transformer use.
- Borings B-7 and B-8 were installed in the area of former building No. 22, which was used for storing lubricating and hydraulic oil drums. A 500-gallon used oil

UST and a 250-gallon UST used for storing kerosene and mineral spirits was also located in this area.

- Boring B-10 was installed down-gradient of the former 10,000-gallon Varsol tank and the 1,250,000-gallon open reservoir, which has been partially filled in with debris from onsite.
- Borings B-11 and B-12 were installed in the former area of five large USTs containing peroxide, caustic and silicate.
- Boring B-13 was installed in the general area of former building No. 10. This building was used to store empty chemical drums and served as the old chemical mixing area of a former bleachery.
- Temporary monitoring wells were installed in three borings where groundwater was encountered (B-1, B-10 and B-12) to facilitate groundwater sampling.
- Samples of materials in the demolition rubble were collected from 15 locations for laboratory analysis for ACM and/or scanning for LBP with an x-ray fluorescence (XRF) instrument. The items collected from various stock piles of debris as suspected ACM or LBP included floor mastic, metal braided wire wrap, roofing materials (shingles and felt paper), black mastic on the bottom of pieces concrete, a foundation coating, pieces of wood with various colors of paint, painted concrete, and flooring tiles.

The Phase II ESA report indicated the presence of building materials containing asbestos or coated with LBP mixed with the debris piles in several locations. The noted ACM, while not normally friable, may have been rendered friable due to exposure to the environment and/or fire. PAH constituents were detected in shallow soils (0- 5 feet) in one location only (B-8, installed adjacent to the former oil storage area and former waste oil/kerosene and mineral spirits USTs). Groundwater was only encountered in three borings, and all concentrations were below detection limits.

Key excerpts from the Phase II ESA conducted by GEC are included in **Appendix B**.

1.3 PROPOSED SITE REDEVELOPMENT

The City has been evaluating options for redevelopment of the property. Subsequent to cleanup, Valley intends to create a large greenspace for area residents to enjoy. The site will be seeded with grass, planted with trees, and maintained to create a park-like setting. The City is also evaluating the potential long-term redevelopment as single or multi-family housing.

2.0 APPLICABLE REGULATIONS AND CLEANUP STANDARDS

2.1 CLEANUP OVERSIGHT RESPONSIBILITY

ADEM has the responsibility for overseeing solid waste, soil, and groundwater cleanups under a variety of regulatory programs. These include sites regulated under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Program, the Brownfield Redevelopment and Voluntary Clean-Up (VCP), the UST Program, the Resource Conservation and Recovery Act (RCRA) Program, the Clean Water Act (CWA) program, the Solid Waste Program, and other sites being addressed through state statutory authority. ADEM's objective is to establish a consistent risk-based decision-making process for all sites, through which waste, soil and groundwater corrective action decisions are made.

For the purposes of the Cleanup Grant, the site will be entered in the ADEM VCP to facilitate rapid movement of the project through the regulatory process. The Alabama Land Recycling and Economic Redevelopment Act created the VCP. The Act allows for the assessment and remediation of contaminated sites and grants certain liability protections, including protection from third party lawsuits, to those non-responsible entities wishing to redevelop brownfield sites. The liability protections are fully transferable to any non-responsible party who may purchase the site provided all land use controls are adequately maintained. If deemed eligible, the applicant submits a review fee and will be responsible for site assessment and cleanup. Upon successful completion of cleanup activities ADEM will issue a Letter of Concurrence which grants the applicant the full liability protections cited in the Act. If the site is not remediated to unrestricted use, the applicant must enter into an Environmental Covenant with ADEM that identifies institutional and/or engineering controls use to protect human health and the environment. As long as these use controls are maintained, the site retains its liability protections provided by the program.

The ADEM Solid Waste Program will also be involved with this project, in support of the ADEM VCP staff. Their role will include technical review of proposed solid waste sampling plans, evaluation of waste segregation studies, and approving which inert materials can be left on site versus requiring offsite disposal in a landfill. All options will be carefully evaluated to determine the appropriate course of action.

Cleanup oversight will be performed by a qualified Environmental Professional (EP) under the direct supervision of a Professional Geologist or Professional Engineer registered in the State of Alabama. The selected EP will oversee the work conducted by its employees and subcontractors to ensure that it is in accordance with all applicable plans, guidelines, and regulations.

2.2 CLEANUP STANDARDS

2.2.1 Demolition Rubble

ADEM Solid Waste regulations require that friable and non-friable ACM be disposed of in a permitted landfill. Demolition rubble containing LBP generated from non-residential structures must be disposed in a Subtitle D lined landfill with leachate collection and groundwater monitoring. Inert materials such as concrete, asphalt, uncontaminated soil, etc. are not regulated and can be used as on-site fill. Metal and painted wood must be removed from the inert materials in order for them to be left on site. These requirements form the basis for the cleanup alternatives presented in **Section 3**.

2.2.2 Soil and Groundwater

The only soil/groundwater impacts at this site exceeding EPA Residential Regional Screening Levels (RSLs) were found in boring B-8, which was installed adjacent to a former oil storage and kerosene/mineral spirits storage area. Elevated PAH concentrations were found in the upper 5 feet of soils only. ADEM requires that detected concentrations be compared to EPA RSLs to determine if additional action is needed. If further action is required, such actions typically include delineation of the extent of impact, establishment of risk based cleanup levels through a risk assessment, either cleanup or monitoring, or placing engineering or institutional controls on the site. Since the PAH-impacted area appears limited in extent, and groundwater was not encountered, attempts will be made to remediate this area by excavation until confirmation sampling indicates that concentrations are below Residential RSLs. This should result in classification for unrestricted use, without the need for additional subsurface investigation or risk assessment.

3.0 CLEANUP ALTERNATIVE EVALUATION

Alternatives for addressing the environmental impacts found during the Phase II ESA were evaluated based on their effectiveness, implementability, and costs. These alternatives are presented below.

- **Cleanup Alternative 1:** No Action
- **Cleanup Alternative 2:** Permitting of the Site as a Construction & Demolition Landfill; Offsite Disposal of all LBP-containing Wastes in a Subtitle D landfill
- **Cleanup Alternative 3:** Excavation/offsite disposal of shallow PAH-impacted Soils; Offsite Disposal of all Demolition Materials at a Subtitle D Landfill
- **Cleanup Alternative 4:** Excavation/offsite Disposal of Shallow PAH-impacted Soils; Segregation and Use of Inert Demolition Material as on-site Fill; Offsite Disposal of all other Demolition Materials at a Subtitle D Landfill

The following assumptions were used in evaluating these alternatives, where applicable:

- The findings of the previously-conducted Phase II ESA are generally representative of site conditions (i.e. further site assessment would reveal no significant variances from the current conceptual site model).
- The total volume of demolition rubble present on the surface that must be addressed is estimated at 17,000 tons. This was determined by the following analysis:
 - Obtaining a current aerial photograph of the site from the Valley Police Department (drone footage) and importing it into AutoCad engineering software.
 - Outlining the waste piles present on the image, and determination of the square footage in each pile.
 - Site reconnaissance to confirm features depicted on the aerial image and estimation of pile heights.

- Development of a volume (cubic yards) estimation spreadsheet using calculated square footage, average pile height, and pile shape (cube, cone, etc.).
- Conversion from cubic yards to tons using an assumed average conversion factor of 1.5.
- The area of PAH-impacted soils in the vicinity of the former waste oil/UST area is limited in extent to an estimated 1,000 tons, and has not impacted groundwater.
- Additional assessment/sampling will be limited to that associated with the profiling of the extent of rubble containing ACM and LBP; and collection of soil samples from the base and sidewalls of the waste oil/UST area following excavation of PAH-impacted soils.
- The site will be entered into the ADEM VCP, but no additional soil borings, monitoring wells, risk assessments, etc. will be required by ADEM.

The following sections provide further analysis of these cleanup alternatives in relation to the planned site improvements and typical brownfields redevelopment considerations. Preliminary cost estimates are provided with each alternative.

3.1 ALTERNATIVE 1: NO ACTION

Under this alternative, the site would be left in its present condition with the demolition rubble and PAH-impacted soils left as is. However, the presence of ACM and LBP in the rubble may pose a current and long-term health risk to area residents should these contaminants become airborne. The only advantage to this alternative is the immediate avoidance of expenses that would be incurred by implementing full cleanup actions.

A second option to the “No Action” alternative would include installation of security fencing around the perimeter of the property to deter site entry. However, this would not prevent potential exposure to airborne contaminants. The only advantages to this alternative are reduction in liabilities associated with site entry and avoidance of cleanup costs. Neither option would serve as a long term solution of redevelopment.

No costs would be incurred for the “No Action” alternative. Should the option to install security fencing be implemented, direct costs would consist of those associated with fence installation. Indirect costs might include the continuing maintenance associated with the security fencing and vegetation control. Costs for this option are estimated at \$50,000 for the fencing, plus \$5,000/year for ongoing maintenance. Since this alternative does little to protect the public or return the site to productive use, this alternative is not recommended.

3.2 ALTERNATIVE 2: PERMITTING OF THE SITE AS A CONSTRUCTION & DEMOLITION LANDFILL; OFFSITE DISPOSAL OF ALL LBP WASTES IN A SUBTITLE D LANDFILL

This alternative would include excavation and offsite disposal of the PAH-impacted soils in the former waste oil/UST area, and permitting of the site as a Construction & Demolition (C&D) Landfill in order to leave all allowable demolition materials in place. Meetings were held with the ADEM Solid Waste Division to discuss this alternative. The ADEM Solid Waste rules were modified in 2017, and the process of permitting a new landfill are now much more rigorous. Significant engineering costs would be incurred, as well as numerous public meetings and approvals to implement this option. In addition, the regional Solid Waste Management Plan may have to be modified to allow for the permitting of the new landfill. The process to complete these actions could take years, with no guarantee of approval. Demolition rubble containing LBP would still have to be segregated and transported to a Subtitle D landfill for disposal, as LBP cannot be disposed of in a C&D landfill. Other negatives associated with this alternative include the stigma of creating a permitted landfill (even if immediately closed after completion of the cleanup project) in the center of a residential area, which could affect property values.

Costs for this alternative were not evaluated, but are estimated to exceed \$500,000. Based on the difficulties in permitting the site as a landfill, cost, time period, potential stigma, and unpredictability of the approval of this option, this alternative is not recommended.

3.3 ALTERNATIVE 3: EXCAVATION/OFFSITE DISPOSAL OF SHALLOW PAH-IMPACTED SOILS; OFFSITE DISPOSAL OF ALL DEMOLITION MATERIALS AT A SUBTITLE D LANDFILL

Alternative 3 assumes that all the demolition wastes present at the site will contain ACM and LBP to the extent that the entire estimated 17,000 tons will have to be transported offsite for disposal at a Subtitle D landfill. Excavation of the small area of PAH-impacted soils would be included in this offsite disposal option.

On-site meetings were held with an environmental construction contractor experienced at similar large-scale removal projects to get a preliminary idea of the potential costs for such an action. Excavation, transport and disposal costs were estimated at \$40 per ton for disposal at the closest Subtitle D landfill, for a total cost of \$680,000 for the estimated 17,000 tons. Costs for entry into the ADEM VCP, waste segregation sampling, and management by an Environmental Professional are estimated at an additional \$100,000, for

a total project cost of \$780,000. While complete removal of the materials would be an effective method of cleanup, the City does not have the financial resources to incur such costs, even if the Cleanup Grant is awarded by the EPA; therefore, this alternative is not recommended.

3.4 ALTERNATIVE 4: EXCAVATION/OFFSITE DISPOSAL OF SHALLOW PAH-IMPACTED SOILS; SEGREGATION AND USE OF INERT DEMOLITION MATERIAL AS ON-SITE FILL; OFFSITE DISPOSAL OF ALL OTHER DEMOLITION MATERIALS AT A SUBTITLE D LANDFILL

Alternative 4 assumes that pre-construction testing will allow segregation of inert wastes from those that contain ACM and LBP. Inert materials (concrete, asphalt, uncontaminated soils, etc.) will be used as fill on the sloped and low portions of the site and covered with clean backfill, subject to ADEM approval. The cleanup plan submitted to ADEM through the VCP process will include a detailed sampling plan to characterize the wastes, which will be reviewed/approved by the Solid Waste Division. Waste piles determined to contain ACM and LBP will be transported to a Subtitle D landfill for disposal. Disposal rates at a C&D landfill for those wastes containing ACM only will also be evaluated, but preliminary information indicates that the nearby Subtitle D landfill may charge a lower per ton rate than the closest C&D landfill. For cost estimating purposes, an estimated 7,800 tons are assumed to have to be transported to the Subtitle D landfill, and 9,200 tons of inert material will remain on site but moved to the lower areas of the site to be used as on-site fill. Excavation of the small area of PAH-impacted soils would also be transported offsite.

On-site meetings were held with an environmental construction contractor experienced at similar large-scale removal projects to get a preliminary idea of costs for this alternative. Excavation, transport and disposal costs were estimated at \$40 per ton for disposal in the Subtitle D landfill, for a total cost of \$312,000 for the estimated 7,800 tons. Costs for movement of inert materials to the on-site fill area are estimated at \$11 per ton, for a total of \$102,300 (for 9,200 tons). Costs for entry into the ADEM VCP, waste segregation sampling, and management by an Environmental Professional are estimated at an additional \$100,000, for a total project cost of \$514,300. It should be noted that the volume of rubble requiring offsite disposal is not known at this time, and these estimates are provided for planning purposes only. Actual costs could vary significantly.

4.0 SELECTED CLEANUP ALTERNATIVE

Based on this preliminary analysis, Alternative 4 appears to be the most viable. Meetings with ADEM VCP and Solid Waste Division personnel have indicated that this alternative may be acceptable, subject to the results of the additional waste sampling and characterization. The cost to implement this approach appears to fit within the cost range of the Cleanup Grant (\$500,000). This recommended alternative should meet the EPA implementability and effectiveness criteria at a cost that is compatible with the funds available should the City be awarded an EPA Cleanup Grant. Should the volume of material requiring offsite disposal be higher than the planning estimates provided above, the City would remove as much of the material as possible with the grant funds, and seek other sources of funding to manage the remaining material. Should the actual volume requiring offsite disposal be lower, grant funds will be used for placement of backfill over the site to facilitate greenspace redevelopment.

5.0 AUTHORIZATION, IMPLEMENTATION, AND PUBLIC COMMENT

As the owner of the property, the City of Valley, as a government entity, is authorized under CERCLA 104(k) to perform cleanup activities at the site. Ownership transfer to the City occurred on August 24, 2018. The site is eligible for this funding as it is not listed or proposed for listing on the National Priorities List. It is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA. It is not subject to the jurisdiction custody, or control of the U.S. government.

The City will contract an EP to assist with conducting the work and ensure compliance with applicable environmental regulations. The ADEM VCP and Solid Waste Divisions will be involved with the process. The EP will develop plans, specifications, and bid documents in order to obtain bids from licensed contractors to conduct the construction aspects of the project.

This draft ABCA has been provided to enable interested stakeholders the opportunity to provide comment on the project and recommended cleanup alternative. Any comments received will be addressed and submitted with the EPA Brownfield Cleanup Grant application. Grant award announcements are anticipated from the EPA mid-2019. Upon

award, Valley will initiate additional public comment opportunities and begin the process of implementing the cleanup. All work will conform to applicable federal, state, and local laws and regulations.

Statement on Climate Change Resilience of Cleanup Alternatives

As a part of the brownfield program, the EPA desires to evaluate how climate change stressors may affect contaminated sites and subsequent cleanups. The most likely vulnerabilities at this cleanup site include flooding from more intense and frequent storms, and changes in precipitation patterns and temperature. Inundation and flooding may lead to transport of contaminants through surface soils, ground water, surface waters and/or coastal waters. These contaminant releases may pose an increased risk of adverse health and environmental impacts. Flooding may also disrupt the ability to pick up waste materials, or to access offsite landfills. A major storm event may increase the amount of solid waste generated, and affect the availability of landfill space. It may also stress available emergency response resources, which may increase the risk of being able to properly respond to cleanup during a flooding or storm event. Changes in precipitation may affect the rate at which vegetation grows at various sites and may affect phytoremediation and ecological revitalization efforts. The impacts may be positive or negative, depending on conditions at each site. Groundwater processes may also be altered, resulting in potential adverse impacts on the performance and cost of remediation. To the extent that temperatures increase with climate change, contaminants at cleanup sites may become more volatile, increasing risks for local populations. Climate change may also affect the ability of emergency management workforce to respond to natural disasters.

The extent of these effects depend on the contaminants and unique conditions at each site. At this site, flooding is not anticipated to affect any of the proposed alternatives based on the elevation, slope, and lack of low areas. The site is not in a federally-designated flood zone. It is possible that access to an offsite landfill could be impeded if the landfill or access roads flooded, or if the landfill was not able to accept additional wastes due to the volume entering the facility from other-flood related cleanups. No groundwater impact has been found at the site, so increased rainfall and recharge is not likely to result in offsite impacts through groundwater flow. Temperature rise might affect the growth rate of grass after cleanup, either positive or negative, which is unknown at this time. In general, the risk of climate change vulnerabilities are anticipated to be minimal with any of the listed cleanup alternatives.

DRAFT

APPENDICES

**APPENDIX A – APPROXIMATE LOCATION OF DEMOLITION RUBBLE PILES
REQUIRING REMOVAL**



PPM PPM CONSULTANTS, INC. www.ppmco.com	
DRAWN BY: BWH	DRAWN DATE: 01/18/19
PROJECT NUMBER: --	PHASE: --

CITY OF VALLEY, ALABAMA
FORMER FAIRFAX MILL
VALLEY, ALABAMA

APPROXIMATE LOCATION OF
DEMOLITION RUBBLE PILES
REQUIRING REMOVAL

FIGURE
NUMBER
X

APPENDIX B – KEY EXCERPTS FROM GEC PHASE II ESA

**REPORT OF LIMITED PHASE II
ENVIRONMENTAL SITE ASSESSMENT
FORMER FAIRFAX MILL
250 BOULEVARD
GEC PROJECT NO.: 180478.341**

PREPARED FOR

**HARRIS GRAY LLC
824 3RD AVENUE
WEST POINT, GEORGIA 31833**

PREPARED BY

**GEOTECHNICAL & ENVIRONMENTAL CONSULTANTS, INC.
5031 MILGEN COURT
COLUMBUS, GEORGIA 31907**

AUGUST 3, 2018
(Revised August 8, 2018)





August 3, 2018
(Revised August 8, 2018)

Mr. Scott Harris
Harris Gray LLC
824 3rd Avenue
West Point, Georgia 31833

SUBJECT: Report of Limited Phase II Environmental Site Assessment
Former Fairfax Mill
250 Boulevard
Valley, Chambers County, Alabama
GEC Project No.: 180478.341

Dear Mr. Harris:

Geotechnical & Environmental Consultants, Inc. (GEC) has completed a Limited Phase II Environmental Site Assessment (ESA) for the above-referenced site. The following report details our scope of work for the Phase II services, our protocol for intrusive sampling and laboratory analysis of physical media, laboratory analytical results, and our conclusions relative to the work performed.

GEC appreciates the opportunity to provide our professional services to you. If you have any questions concerning this report, or if we can be of further assistance, please feel free to contact our office.

Sincerely,
GEOTECHNICAL & ENVIRONMENTAL CONSULTANTS, INC.

A handwritten signature in black ink that reads "Jeremy Burke".

Jeremy S. Burke, E.I.T.
Staff Engineer

Jason A. Cooper, P.E.
Columbus Branch Manager
AL Reg. No. 29656

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1.0 BACKGROUND

The subject property is currently unoccupied and has the remains of the former Fairfax Mill. The Phase I ESA, dated July 13, 2018, identified the following Recognized Environmental Conditions:

- The operation as a cotton mill at the subject property is deemed to be a recognized environmental condition, due to the environmental issues historically found at these types of facilities.
- The former use/storage of petroleum products and other potential hazardous materials and the past releases of chemicals to the environment are deemed to be a Recognized Environmental Condition (REC).
- The vapor encroachment condition is not currently deemed to be a REC, due to the current use of the site (with no permanent onsite structures), and the proposed use of the site as a green space. If it is determined that structures will be built at the site, then this opinion will need to be re-evaluated at that time.
- The dumping and/or landfilling of the demolition debris at the site is a regulatory issue and due to the age of the debris and possibility of lead based paint or asbestos containing material in the debris, this is deemed to be a REC.

Based on these RECs associated with the onsite concerns from the former uses of the mill, additional environmental assessment was recommended. The client wishes to perform the limited Phase II ESA at the site, prior to purchase of the property.

2.0 SCOPE OF WORK

The Phase II ESA consisted of the installation of fourteen soil borings into the subsurface at the site to facilitate the sampling of subsurface media (soil and groundwater). The boring installations, groundwater sampling, laboratory analyses, and analytical results are discussed in more detail in the following paragraphs.

Boring B-1 was performed in the proximity of the former 50,000-gallon AST noted in Figure 3. Boring B-2 was performed down-gradient of former building No. 20, which was used as storage for 55-gallon drums of sodium hydrosulfite. Boring B-3 was performed in the general area of the former 550-gallon USTs. Borings B-4 and B-9 was performed due to the storage buildings on the adjacent property. Boring B-5 was performed in the general area of the former coal pile on the eastern portion of the property. Borings B-6 and B-14 were performed in the area of former transformer use. Borings B-7 and B-8 were performed in the area of former building No. 22, which was used as storage of lubricating and hydraulic oil drums. Also, there was one 500-gallon UST that was used for waste oil and one 250-gallon UST for kerosene and mineral spirits. Boring B-10 was performed

down-gradient of the former 10,000-gallon varsol tank and the 1,250,000-gallon open reservoir, which has been partially filled in with debris from onsite. Borings B-11 and B-12 were performed in the former area of 5 large USTs containing peroxide, caustic and silicate. Boring B-13 was performed in the general area of former building No. 10. This building was used to store empty chemical drums and served as the old chemical mixing area of a former bleachery.

3.0 INTRUSIVE SAMPLING

3.1 Soil Boring

On July 17, 2018 GEC supervised the installation of fourteen subsurface borings at the locations indicated on Figure 2. The borings were installed using a skid-steer mounted Geoprobe rig. Soil sampling was performed utilizing a stainless-steel sampling device, equipped with acetate liners.

Prior to introduction into the subsurface, all downhole apparatus was thoroughly decontaminated by steam cleaning, or washing with a Liquinox detergent solution and rinsing with potable water. On-site personnel wore new disposable latex or nitril gloves when handling any probe or sampling equipment in order to prevent cross-contamination of laboratory samples.

The borings were extended to the following approximate depth below the existing ground surface: B-1 (45 ft.), B-2 (10 ft.), B-3 (10 ft.), B-4 (10 ft.), B-5 (10 ft.), B-6 (10 ft.), B-7 (10 ft.), B-8 (10 ft.), B-9 (10 ft.), B-10 (30 ft.), B-11 (10 ft.), B-12 (35 ft.), B-13 (10 ft.) and B-14 (10 ft.). The approximate depth to groundwater, encountered in some of the borings at the time of sampling (\approx 24 hours after drilling), is as follows: B-1 (31.75 ft.), B-10 (13.60 ft.) and B-12 (20.75 ft.).

Soil samples were collected from the borings (at 5 feet intervals) and screened with a photo ionization detector (PID) for the presence of volatile constituents. The results of the screening are shown on the borings logs included in Appendix 3. A total of 13 samples were submitted for laboratory analysis. The samples were evacuated directly from the tubing into the laboratory provided containers (with appropriate preservative). The sample containers were then packaged in a cooler on ice with appropriate chain-of-custody documentation, and were shipped by overnight carrier to the analytical laboratory for the selected analyses.

3.2 Groundwater Sampling

Upon completion of the installation of the borings, a temporary monitoring well was emplaced into three of the borings (B-1, B-10 and B-12). The temporary monitoring wells were constructed of varying lengths of 0.010" slotted, 1" ID PVC screen, with 1" ID PVC riser to the surface. Specific construction details for each well are shown on the individual boring/well logs in Appendix 3.

On July 18, 2018, the temporary monitoring wells were sampled, utilizing a peristaltic pump, with dedicated nylon tubing. The samples were evacuated directly from the tubing into the laboratory provided containers (with appropriate preservative). The sample containers were then packaged in a

cooler on ice with appropriate chain-of-custody documentation, and were shipped by overnight carrier to the analytical laboratory for the selected analyses.

3.3 Debris Sampling for Asbestos/LBP

At the time of the Phase II ESA, debris piles, from the demolition of the former mill, were noted throughout the property. Additionally, the former reservoir had been mostly filled with debris from the former mill. As part of the site evaluation, select samples of building material were collected from various debris piles across the site, for laboratory analysis for asbestos and/or scanning for lead with an XRF. The items collected from various stock piles of debris as suspected asbestos containing materials or lead based paint included floor mastic, metal braided wire wrap, roofing materials (shingles and felt paper), black mastic on the bottom of pieces concrete, a foundation coating, pieces of wood with various colors of paint, and flooring tiles.

4.0 LABORATORY RESULTS

The soil and groundwater samples retrieved from the site were overnighted to Analytical Environmental Services, Inc. (AES) in Atlanta, Georgia, for analysis for volatile organic compounds (VOCs), poly-nuclear aromatic hydrocarbons (PAHs), poly-chlorinated biphenyls (PCBs) and RCRA metals. A copy of the laboratory report is included in Appendix 2 of this report.

The analytical results for the thirteen soil samples collected at the site, and submitted for laboratory analyses, indicate that the following constituents are present at concentrations exceeding the laboratory detection limits: Acetone, Tetrachloroethene, 1,1,1-Trichloroethane, Trichlorofluoromethane, Aroclor 1242, Aroclor 1260, Arsenic, Barium, Chromium, Lead, Nickel, Zinc, Naphthalene, Acenaphthylene, 1-Methylnaphthalene, 2-Methylnaphthalene, Acenaphthene, Fluorene, Phenanthrene, Anthracene, Fluoranthene, Pyrene, Benzo(a)anthracene, Chrysene, Benzo(b)fluoranthene, Benzo(k)fluoranthene, Benzo(a)pyrene, Dibenz(a,h)anthracene, Benzo(g,h,i)perylene, and Indeno(1,2,3-cd)pyrene. One or more of these constituents were detected in all thirteen of the samples submitted for analysis. Exceedances of the applicable EPA Regional Screening Levels (RSL) release notification concentration, for soil, were noted for twenty-four constituents (Acetone, Tetrachloroethene, 1,1,1-Trichloroethane, Aroclor 1242, Aroclor 1260, Arsenic, Barium, Lead, Nickel, Zinc, Naphthalene, 1-Methylnaphthalene, 2-Methylnaphthalene, Acenaphthene, Fluorene, Fluoranthene, Pyrene, Benzo(a)anthracene, Chrysene, Benzo(b)fluoranthene, Benzo(k)fluoranthene, Benzo(a)pyrene, Dibenz(a,h)anthracene and Indeno(1,2,3-cd)pyrene) in nine samples (B-3 @ 0-5, B-4 @ 0-5, B-5 @ 0-0.5, B-6 @ 0-5, B-7 @ 0-5, B-8 @ 0-5, B-11 @ 0-5, B-13 @ 0-5 and B-14 @ 0-5).

The results of the laboratory analyses of the groundwater samples indicate that none of the analyzed constituents were exhibited in concentrations exceeding the laboratory reporting limits.

The results of the scanning/analysis indicated that various materials contain asbestos and/or lead-based paint. The following materials were determined to contain asbestos: roofing felt (20%

chrysotile), roofing tar (5% chrysotile), and concrete slab underlayment mastic (3% chrysotile).

Yellow and green painted surfaces (along with underlying paint colors) were determined to contain sufficient lead to be deemed lead based paint. Representative photos of the paint, deemed to be LBP, are included in Appendix 4.

5.0 CONCLUSIONS AND RECOMMENDATIONS

Based on the results of the soil samples collected at the site, chemicals of concern (COCs) were encountered at the subject property, in concentrations exceeding the laboratory detection limits, which constitutes a release. Several of these constituents, were encountered at concentrations exceeding the applicable EPA Regional Screening Level concentrations. If the property is acquired, the owner of the property is required to make notification of the release to ADEM. Alternately, notification of this release can be made through submittal of the Voluntary Cleanup Program (VCP) through the Alabama Brownfield Program.

Building materials, determined to contain asbestos and/or were coated with LBP, were identified to be mixed with the debris piles across the site, as well as the material disposed in the former reservoir. The noted asbestos containing material, while not normally friable, due to its exposure to the environment (and/or fire), appears to have been rendered friable.

In the state of Alabama, asbestos containing materials, friable or non-friable, may be disposed of in any permitted landfill. Materials containing lead-based paint, from a non-residential structure, must be disposed in a lined landfill with leachate collection and groundwater monitoring. See the Management of Demolition Waste fact sheet in Appendix 5 for further information. Based on the fact that much of the LBP and asbestos containing materials at the site have been mixed with the other demolition debris, this material should be removed from the site and disposed in an approved landfill.

6.0 USER RELIANCE

This report is intended for the use of Harris Gray, LLC, and their representatives for their use in evaluating the environmental liability associated with the subject property. GEC is not affiliated with Harris Gray, LLC. GEC is not responsible for opinions, conclusions, or recommendations made by others based on the findings in this report. This report and its findings shall not, in whole or in part, be disseminated to any other party, or used by any other party without the prior written consent of Geotechnical & Environmental Consultants, Inc.

APPENDIX 1

Former Fairfax Mill
250 Boulevard
Valley, Chambers County, Alabama
GEC Project No. 180478.341

TABLE 1
SOIL ANALYTICAL RESULTS
PAHs

Sample ID	Sample Date	Naphthalene	Acenaph- thylene	1-Methyl- naphthalene	2-Methyl- naphthalene	Acenaphthene	Fluorene	Phenanthrene	Anthracene	Fluoranthene	Pyrene	Benz(a) anthracene	Chrysene	Benzo(b) fluoranthene	Benzo(k) fluoranthene	Benzo(a) pyrene	Dibenz(a,h) anthracene	Benzo(g,h,i) perylene	Indeno(1,2,3-cd) pyrene
B-2 @ 0-5	7/17/2018	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
B-3 @ 0-5	7/17/2018	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
B-3 @ 5-10	7/17/2018	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT
B-4 @ 0-5	7/17/2018	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
B-5 @ 0-0.5	7/17/2018	1.7	BRL	2.8	2.8	BRL	BRL	2.7	BRL	2.50	2.00	0.63	1.3	0.98	BRL	BRL	BRL	BRL	BRL
B-6 @ 0-5	7/17/2018	BRL	BRL	BRL	BRL	BRL	BRL	0.6	BRL	1.10	1.00	0.41	0.48	0.66	BRL	BRL	BRL	BRL	BRL
B-7 @ 0-5	7/17/2018	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	0.48	0.43	BRL	BRL	0.58	BRL	0.39	BRL	BRL	BRL
B-8 @ 0-5	7/17/2018	1.2	0.53	0.71	0.83	2.3	2.6	22	5.6	30	26	16	13	18	3.9	12	2.8	8.2	7.2
B-9 @ 0-5	7/17/2018	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	0.42	0.4	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
B-11 @ 0-5	7/17/2018	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
B-11 @ 5-10	7/17/2018	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT
B-13 @ 0-5	7/17/2018	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT
B-14 @ 0-5	7/17/2018	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
Protection of Groundwater		0.00054	NL	0.006	0.019	0.55	0.54	NL	5.8	8.9	1.3	0.011	9	0.3	2.9	0.24	0.096	NL	0.98
Resident Soil		3.8	NL	18	24	360	240	NL	1800	240	180	1.1	110	1.1	11	0.11	0.11	NL	1.1
CAS Number		91-20-3	208-96-8	90-12-0	91-57-6	83-32-9	86-73-7	85-01-8	120-12-7	206-44-0	129-00-0	56-55-3	218-01-9	205-99-2	207-08-9	50-32-8	53-70-3	191-24-2	193-39-5
Units		mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/Kg

*EPA Regional Screening Levels

Protection of groundwater exceedances are shown in bold font.

Resident soil exceedances are shown in bold, red font

NT - not tested

NA - not applicable

NL - not listed

mg/Kg - milligrams per kilogram

BRL - below reporting limits

Former Fairfax Mill
250 Boulevard
Valley, Chambers County, Alabama
GEC Project No. 180478.341

TABLE 2
SOIL ANALYTICAL RESULTS
VOCs, PCBs, RCRA Metals

Sample ID	Sample Date	Acetone	Tetrachloroethene	1,1,1-Trichloroethane	Trichlorofluoro methane	Other VOCs	Aroclor 1242	Aroclor 1260	Other PCBs	Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Nickel	Selenium	Silver	Zinc
B-2 @ 0-5	7/17/2018	0.19	BRL	BRL	BRL	BRL	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT
B-3 @ 0-5	7/17/2018	NT	NT	NT	NT	NT	NT	NT	NT	BRL	43.6	BRL	35.9	15.4	BRL	BRL	BRL	BRL	29.7
B-3 @ 5-10	7/17/2018	BRL	BRL	BRL	BRL	BRL	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT
B-4 @ 0-5	7/17/2018	0.32	BRL	BRL	BRL	BRL	NT	NT	NT	BRL	32.4	BRL	22.4	13.6	BRL	5.15	BRL	BRL	22.4
B-5 @ 0-0.5	7/17/2018	NT	NT	NT	NT	NT	NT	NT	NT	9.19	77	BRL	12.6	11.50	BRL	5.75	BRL	BRL	73.5
B-6 @ 0-5	7/17/2018	BRL	BRL	BRL	BRL	BRL	0.063	17	BRL	BRL	93.3	BRL	28.5	18	BRL	14.1	BRL	BRL	63.3
B-7 @ 0-5	7/17/2018	BRL	BRL	BRL	BRL	BRL	NT	NT	NT	BRL	4.31	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
B-8 @ 0-5	7/17/2018	BRL	0.01	0.41	0.013	BRL	NT	NT	NT	BRL	76.5	BRL	19.5	121.0	BRL	4.47	BRL	BRL	414
B-9 @ 0-5	7/17/2018	0.12	BRL	BRL	BRL	BRL	NT	NT	NT	BRL	26.3	BRL	34.2	13.8	BRL	BRL	BRL	BRL	23.2
B-11 @ 0-5	7/17/2018	NT	NT	NT	NT	NT	NT	NT	NT	5.95	132	BRL	31	144	BRL	6.85	BRL	BRL	2,230
B-11 @ 5-10	7/17/2018	BRL	BRL	BRL	BRL	BRL	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT
B-13 @ 0-5	7/17/2018	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	133	BRL	37.9	16.9	BRL	35.9	BRL	BRL	97.6
B-14 @ 0-5	7/17/2018	0.14	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	81.4	BRL	42.7	19	BRL	10.8	BRL	BRL	58.9
Protection of Groundwater		0.29	0.0018	0.07	0.33	NA	0.0012	0.0055	NA	0.29	82	7.1	180,000	14	0.1	2.6	0.26	0.08	37
Resident Soil		6,100	8.1	810	2,300	NA	0.22	0.22	NA	0.68	1,500	7.1	NL	400	1.1	150	39	39	2,300
CAS Number		67-64-1	127-18-4	71-55-6	75-69-4	NA	53469-21-9	11096-82-5	NA	7440-38-2	7440-39-3	7440-43-9	7440-47-3	7439-92-1	7439-97-6	7440-02-0	7782-49-2	7440-22-4	7440-66-6
Units		mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg

*EPA Regional Screening Levels
Protection of groundwater exceedances are shown in bold font.
Resident soil exceedances are shown in bold, red font

NT - not tested
NA - not applicable
NL - not listed

mg/Kg - milligrams per kilogram

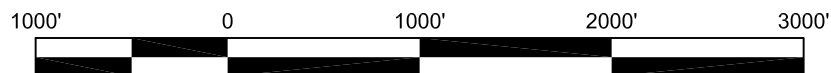
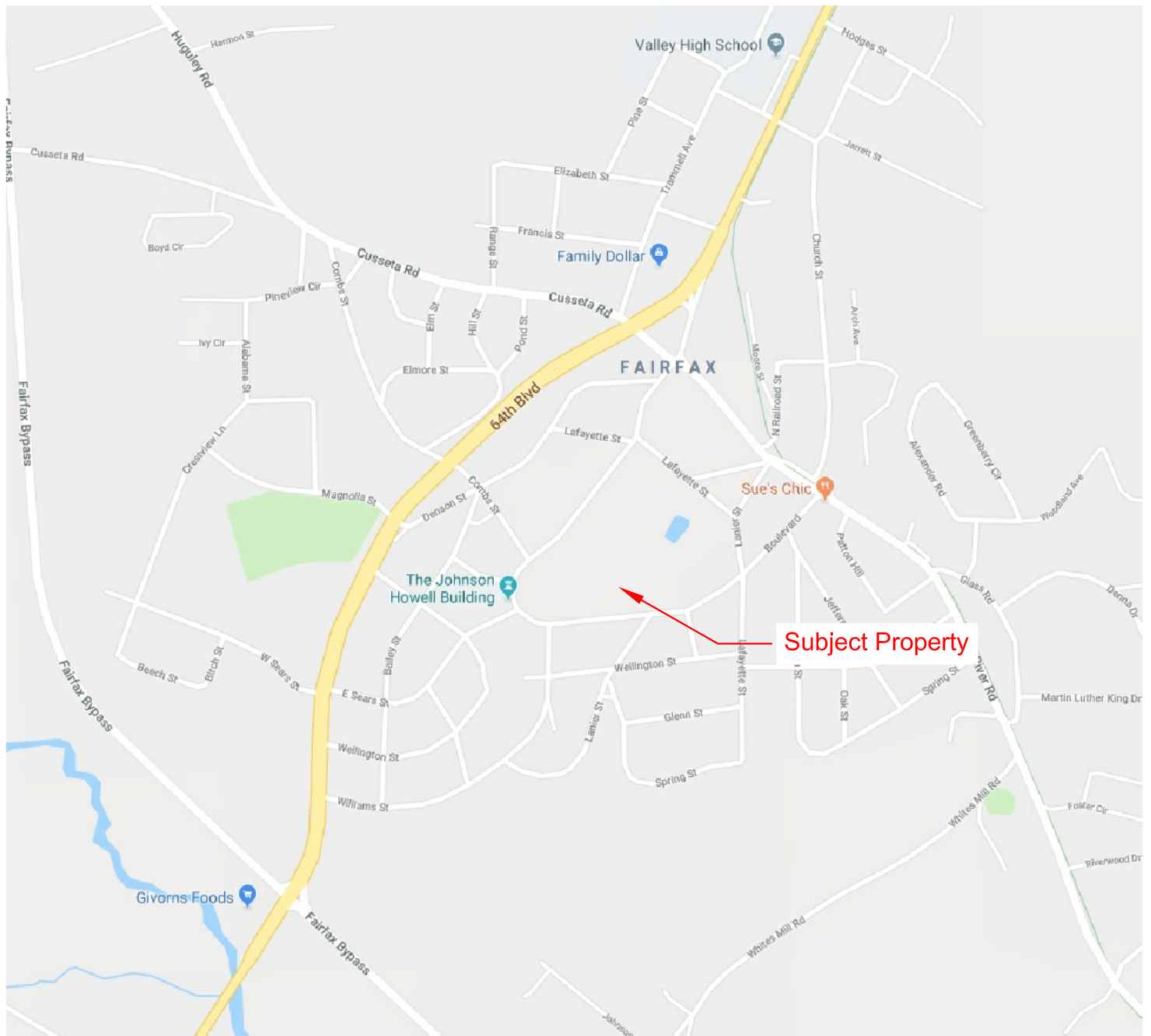
BRL - below reporting limits

**Former Fairfax Mill
250 Boulevard
Valley, Chambers County, Alabama
GEC Project No. 180478.341**

**TABLE 3
GROUNDWATER ANALYTICAL RESULTS
VOCs & PAHs**

Sample ID	Sample Date	VOCs	PAHS
MW-1	7/18/2018	BRL	BRL
MW-10	7/18/2018	BRL	BRL
MW-12	7/18/2018	BRL	BRL
Threshold*		NA	NA
Units		µg/L	µg/L
CAS Number		NA	NA

*EPA Regional Screening Levels
Protection of groundwater exceedances are shown in bold font.
Resident soil exceedances are shown in bold, red font
BRL - below reporting limits NA - not applicable



APPROXIMATE SCALE: 1" = 1000'

— = Approximate Subject Property Boundary



Figure 1
Site Location Map
Former Fairfax Mill
250 Boulevard
Valley, Chambers County, Alabama
GEC Project No. 180478.341

GEC
GEOTECHNICAL
&
ENVIRONMENTAL
CONSULTANTS, INC.

5031 MILGEN COURT
COLUMBUS, GEORGIA 31907
706-569-0008 (Fax) 706-569-0940
WWW.GECONSULTANTS.COM



— = Approximate Subject Property Boundary

⊕ = Approximate Location of Boring/Well



APPROXIMATE SCALE: 1" = 300'

Figure 2
Boring/Well Location Plan
Former Fairfax Mill
250 Boulevard
Valley, Chambers County, Alabama
GEC Project No. 180478.341

GEC
GEOTECHNICAL
&
ENVIRONMENTAL
CONSULTANTS, INC.

5031 MILGEN COURT
COLUMBUS, GEORGIA 31907
706-569-0008 (Fax) 706-569-0940
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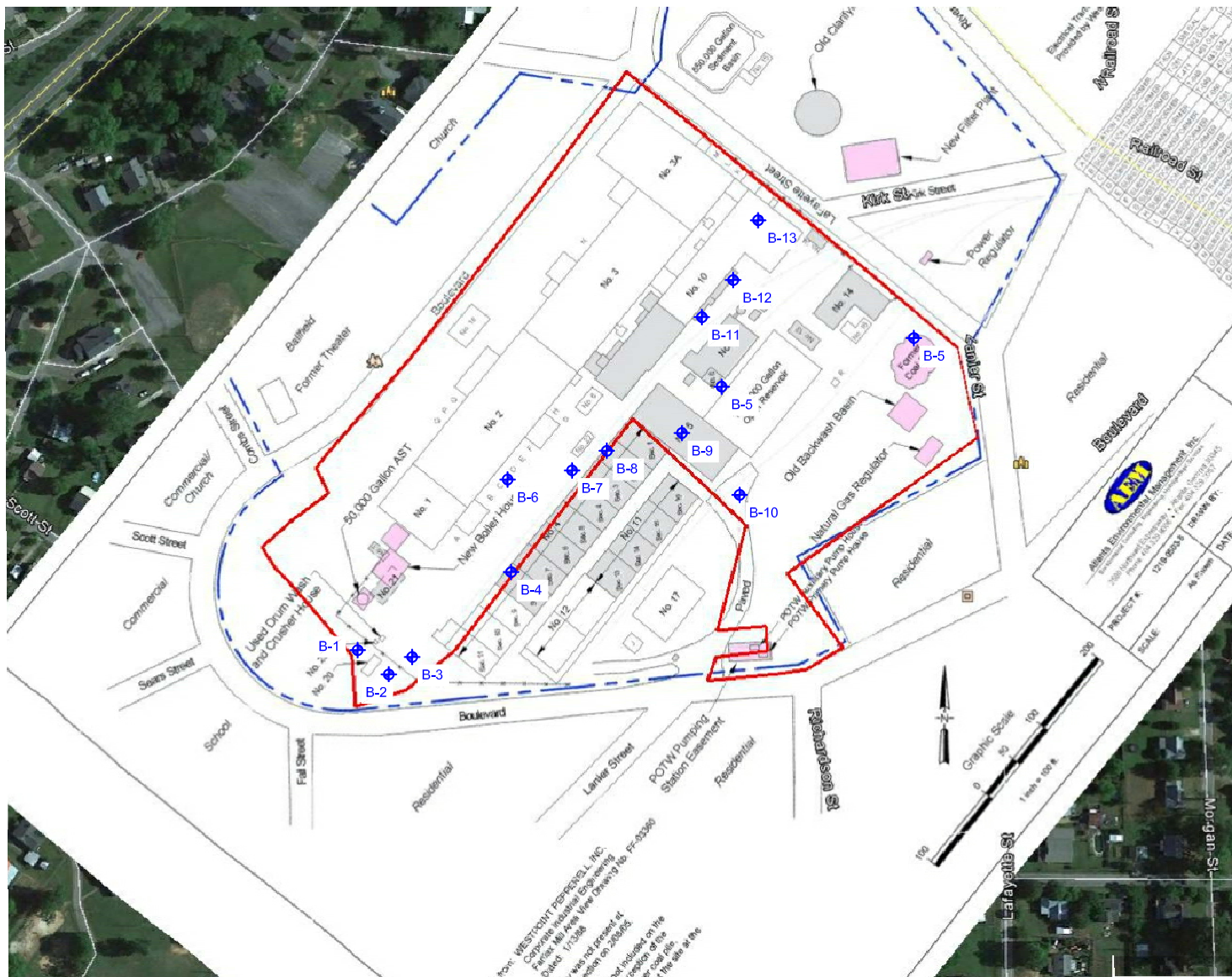


Image Source: AEM Phase I Report dated March 4, 2005.

— = Approximate Subject Property Boundary

◆ = Approximate Location of Boring/Well



APPROXIMATE SCALE: 1" = 300'



Figure 3
Boring/Well Location Plan
Former Fairfax Mill
250 Boulevard
Valley, Chambers County, Alabama
GEC Project No. 180478.341

GEC
GEOTECHNICAL
&
ENVIRONMENTAL
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APPENDIX 2

Lead Base Paint Analytical Results

Reading No	Time	Type	Duration	Units	Sequence	Component	Substrate	Side	Condition	Color	Res	Escale1	EscleCT	Results	Depth Index	Action Level	PbC	PbC Error
1	6/26/2018 13:22	SHUTTER_CAL	422.32	cps	Final						423.65	4.68	2.45				0.87	0
2	6/26/2018 13:30	PAINT	20.67	mg / cm ^2	Final				CALIBRATE					Positive	1.06	1	1.1	0.1
3	6/26/2018 13:31	PAINT	20.67	mg / cm ^2	Final				CALIBRATE					Positive	1.1	1	1.1	0.1
4	6/26/2018 13:32	PAINT	19.85	mg / cm ^2	Final				CALIBRATE					Positive	1.11	1	1.1	0.1
5	6/26/2018 13:54	PAINT	1.16	mg / cm ^2	Final	SIDING	CONCRETE	A	INTACT	RED				Negative	1	1	0	0.04
6	6/26/2018 13:54	PAINT	1.16	mg / cm ^2	Final	SIDING	CONCRETE	A	INTACT	RED				Negative	1	1	0	0.03
7	6/26/2018 13:55	PAINT	1.71	mg / cm ^2	Final	SIDING	CONCRETE	A	INTACT	RED				Negative	1	1	0	0.02
8	6/26/2018 13:55	PAINT	1.16	mg / cm ^2	Final	SIDING	CONCRETE	A	INTACT	RED				Negative	1	1	0	0.02
9	6/26/2018 13:55	PAINT	1.17	mg / cm ^2	Final	DEBRIS	WOOD	A	PEELING	YELLOW				Positive	5.62	1	4.1	2.6
10	6/26/2018 13:56	PAINT	0.93	mg / cm ^2	Final	DEBRIS	WOOD	A	PEELING	YELLOW				Positive	8.16	1	8.6	6.9
11	6/26/2018 13:56	PAINT	0.86	mg / cm ^2	Final	DEBRIS	WOOD	A	PEELING	YELLOW				Positive	7.62	1	8.8	7.5
12	6/26/2018 13:57	PAINT	3.03	mg / cm ^2	Final	DEBRIS	WOOD	A	PEELING	GREEN				Positive	4.19	1	6.3	5.1
13	6/26/2018 13:57	PAINT	1.55	mg / cm ^2	Final	DEBRIS	WOOD	A	PEELING	GREEN				Positive	4.31	1	6.6	4.8
14	6/26/2018 14:04	PAINT	14.22	mg / cm ^2	Final				CALIBRATE					Positive	1.01	1	1	0.1
15	6/26/2018 14:05	PAINT	16.35	mg / cm ^2	Final				CALIBRATE					Positive	1.05	1	1.1	0.1
16	6/26/2018 14:06	PAINT	20.02	mg / cm ^2	Final				CALIBRATE					Positive	1.05	1	1	0.1
1	7/17/2018 14:31	SHUTTER_CAL	439.55	cps	Final						436.59	4.65	2.39				0.88	0
2	7/17/2018 14:35	PAINT	15.55	mg / cm ^2	Final				CALIBRATE					Positive	1.06	1	1	0.1
3	7/17/2018 14:36	PAINT	15.89	mg / cm ^2	Final				CALIBRATE					Positive	1.06	1	1.1	0.1
4	7/17/2018 14:37	PAINT	17.77	mg / cm ^2	Final				CALIBRATE					Positive	1.02	1	1.1	0.1
5	7/17/2018 14:49	PAINT	1.24	mg / cm ^2	Final	DEBRIS	WOOD	A	PEELING	GREEN				Positive	10	1	4.3	2.4
6	7/17/2018 14:50	PAINT	1.7	mg / cm ^2	Final	DEBRIS	WOOD	A	PEELING	GREEN				Positive	10	1	5.4	3.3
7	7/17/2018 14:51	PAINT	1.12	mg / cm ^2	Final	DEBRIS	WOOD	A	PEELING	GREEN				Negative	1	1	0	0.05
8	7/17/2018 14:52	PAINT	0.88	mg / cm ^2	Final	DEBRIS	CONCRETE	A	INTACT	RED				Negative	1	1	0	0.03
9	7/17/2018 14:53	PAINT	0.74	mg / cm ^2	Final	DEBRIS	CONCRETE	A	INTACT	RED				Negative	1	1	0	0.03
10	7/17/2018 15:00	PAINT	18.86	mg / cm ^2	Final				CALIBRATE					Positive	1.02	1	1.1	0.1
11	7/17/2018 15:01	PAINT	17.26	mg / cm ^2	Final				CALIBRATE					Positive	1.05	1	1.1	0.1
12	7/17/2018 15:02	PAINT	18.21	mg / cm ^2	Final				CALIBRATE					Positive	1.03	1	1	0.1

ANALYTICAL ENVIRONMENTAL SERVICES, INC.

3080 Presidential Drive, Atlanta, GA 30340-3704
(770) 457-8177 / Toll Free (800) 972-4889 / Fax (770) 457-8188

CHAIN OF CUSTODY
BULK ASBESTOS ANALYSIS

1807 F91

Client Name: Geotechnical & Environmental Consultants, Inc. Phone: (706) 569-0008
Address: 5031 Milgen Court Fax: (706) 569-0940
City, State, Zip: Columbus, Georgia 31907 Project Name: Fairfax
Contact: Kevin Strampler Project Number: 180478.341
Sampler's Name: Kevin Strampler Sampling Date: 7/17/18

	Sample ID	Sample Location/Description	Analysis Requested	Turnaround Time	Comments	For AES Use Only
1	DPM-1	Floor Coating	PLM	Standard		
2	DPM-2	Floor Coating				
3	DPM-3	Wire wrap				
4	DPM-4	Roofing Material				
5	DPM-5	Roofing Material				
6	DPM-6	Roofing Material				
7	DPM-7	Roofing Material				
8	DPM-8	Roofing Material				
9	DPM-9	Roofing Material				
10	DPM-10	Roofing Material				
11	DPM-11	Roofing Material				
12	DPM-12	Slab Underlayment				
13	DPM-13	Slab Underlayment				
14	DPM-14	Foundation Coating				
15	DPM-15	Foundation Coating				
16						
17						
18						
19						
20						

Relinquished by: [Signature]
Received by: _____
Relinquished by: _____
Received by: _____

Date/Time: 7/17/18 17:00
Date/Time: _____
Date/Time: _____
Date/Time: _____

Lab Recipient

Monica E. Albrecht

FOR LAB USE ONLY

Date/Time: 7/18 10:30 Method of Shipment: (FEDEX)



ANALYTICAL ENVIRONMENTAL SERVICES, INC.
Bulk Sample Summary Report



Lab Code 102082-0

24-Jul-18

Client Name: **GeoTechnical & Environmental Consultants**

AES Job Number: **1807F91**

Project Name: **FAIRTAX**

Project Number: **180478.341**

Client ID	AES ID	Location	Asbestos Mineral Percentage						Comments
			CH	AM	CR	AN	TR	AC	
DPM-1 Layer: 1	1807F91-001A	Floor Coating	ND	ND	ND	ND	ND	ND	Flooring
DPM-2 Layer: 1	1807F91-002A	Floor Coating	ND	ND	ND	ND	ND	ND	Flooring
DPM-2 Layer: 2	1807F91-002A	Floor Coating	ND	ND	ND	ND	ND	ND	Leveling compound
DPM-3 Layer: 1	1807F91-003A	Wire Wrap	ND	ND	ND	ND	ND	ND	
DPM-3 Layer: 2	1807F91-003A	Wire Wrap	ND	ND	ND	ND	ND	ND	
DPM-3 Layer: 3	1807F91-003A	Wire Wrap	ND	ND	ND	ND	ND	ND	

Note: CH=chrysotile, AM=amosite, CR=crocidolite, AC=actinolite, TR=tremolite, AN=anthophyllite

For comments on the samples, see the individual analysis sheets.

ND = None Detected

AES, Inc. is accredited by NIST's National Voluntary Laboratory Accreditation Program (NVLAP) for Polarized Light Microscopy (PLM) analysis, Lab Code 102082-0. All analyses performed in accordance with EPA "Interim Method for the Determination of Asbestos in Bulk Insulation Samples" (EPA 600/M4-82-020), 1982 as found in 40 CFR, Part 763, Appendix E to Subpart E and "Method for the Determination of Asbestos in Bulk Building Materials" (EPA/600/R-93/116), 1993.

These test results apply only to those samples actually tested, as submitted by the client. All percentages are reported by visually estimated volume.

PLM is not consistently reliable in detecting small concentrations of asbestos in floor tiles and similar nonfriable materials, quantitative TEM is currently the only method that can be used to determine conclusive asbestos content.

This report must not be reproduced except in full without written approval of Analytical Environmental Services, Inc.

Microanalyst:

Penka Topuzova

QC Analyst:

Yelena Khanina



Bulk Sample Summary Report

Client Name: **GeoTechnical & Environmental Consultants**AES Job Number: **1807F91**Project Name: **FAIRTAX**Project Number: **180478.341**

Client ID	AES ID	Location	Asbestos Mineral Percentage						Comments
			CH	AM	CR	AN	TR	AC	
DPM-3 Layer: 4	1807F91-003A	Wire Wrap	ND	ND	ND	ND	ND	ND	Metal included as binder
DPM-4 Layer: 1	1807F91-004A	Roofing material	ND	ND	ND	ND	ND	ND	
DPM-4 Layer: 2	1807F91-004A	Roofing material	ND	ND	ND	ND	ND	ND	
DPM-5 Layer: 1	1807F91-005A	Roofing material	ND	ND	ND	ND	ND	ND	
DPM-5 Layer: 2	1807F91-005A	Roofing material	ND	ND	ND	ND	ND	ND	
DPM-5 Layer: 3	1807F91-005A	Roofing material	ND	ND	ND	ND	ND	ND	

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Bulk Sample Summary Report

Client Name: **GeoTechnical & Environmental Consultants**AES Job Number: **1807F91**Project Name: **FAIRTAX**Project Number: **180478.341**

Client ID	AES ID	Location	Asbestos Mineral Percentage						Comments
			CH	AM	CR	AN	TR	AC	
DPM-6 Layer: 1	1807F91-006A	Roofing material	ND	ND	ND	ND	ND	ND	Tar
DPM-6 Layer: 2	1807F91-006A	Roofing material	20	ND	ND	ND	ND	ND	Felt
DPM-6 Layer: 3	1807F91-006A	Roofing material	ND	ND	ND	ND	ND	ND	Tar
DPM-7 Layer: 1	1807F91-007A	Roofing material	20	ND	ND	ND	ND	ND	Felt
DPM-7 Layer: 2	1807F91-007A	Roofing material	ND	ND	ND	ND	ND	ND	Felt
DPM-8 Layer: 1	1807F91-008A	Roofing material	ND	ND	ND	ND	ND	ND	

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For comments on the samples, see the individual analysis sheets.

ND = None Detected

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Bulk Sample Summary Report

Client Name: **GeoTechnical & Environmental Consultants**AES Job Number: **1807F91**Project Name: **FAIRTAX**Project Number: **180478.341**

Client ID	AES ID	Location	Asbestos Mineral Percentage						Comments
			CH	AM	CR	AN	TR	AC	
DPM-8 Layer: 2	1807F91-008A	Roofing material	ND	ND	ND	ND	ND	ND	
DPM-8 Layer: 3	1807F91-008A	Roofing material	ND	ND	ND	ND	ND	ND	
DPM-9 Layer: 1	1807F91-009A	Roofing material	ND	ND	ND	ND	ND	ND	
DPM-9 Layer: 2	1807F91-009A	Roofing material	ND	ND	ND	ND	ND	ND	
DPM-10 Layer: 1	1807F91-010A	Roofing material	ND	ND	ND	ND	ND	ND	
DPM-10 Layer: 2	1807F91-010A	Roofing material	ND	ND	ND	ND	ND	ND	

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For comments on the samples, see the individual analysis sheets.

ND = None Detected

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Bulk Sample Summary Report

Client Name: **GeoTechnical & Environmental Consultants**AES Job Number: **1807F91**Project Name: **FAIRTAX**Project Number: **180478.341**

Client ID	AES ID	Location	Asbestos Mineral Percentage						Comments
			CH	AM	CR	AN	TR	AC	
DPM-10 Layer: 3	1807F91-010A	Roofing material	ND	ND	ND	ND	ND	ND	
DPM-11 Layer: 1	1807F91-011A	Roofing material	5	ND	ND	ND	ND	ND	Tar
DPM-11 Layer: 2	1807F91-011A	Roofing material	ND	ND	ND	ND	ND	ND	Felt
DPM-11 Layer: 3	1807F91-011A	Roofing material	ND	ND	ND	ND	ND	ND	Tar
DPM-12 Layer: 1	1807F91-012A	Slab Underlayment	ND	ND	ND	ND	ND	ND	Felt
DPM-12 Layer: 2	1807F91-012A	Slab Underlayment	3	ND	ND	ND	ND	ND	Black Mastic

Note: CH=chrysotile, AM=amosite, CR=crocidolite, AC=actinolite, TR=tremolite, AN=anthophyllite

For comments on the samples, see the individual analysis sheets.

ND = None Detected

AES, Inc. is accredited by NIST's National Voluntary Laboratory Accreditation Program (NVLAP) for Polarized Light Microscopy (PLM) analysis, Lab Code 102082-0. All analyses performed in accordance with EPA "Interim Method for the Determination of Asbestos in Bulk Insulation Samples" (EPA 600/M4-82-020), 1982 as found in 40 CFR, Part 763, Appendix E to Subpart E and "Method for the Determination of Asbestos in Bulk Building Materials" (EPA/600/R-93/116), 1993.

These test results apply only to those samples actually tested, as submitted by the client. All percentages are reported by visually estimated volume.

PLM is not consistently reliable in detecting small concentrations of asbestos in floor tiles and similar nonfriable materials, quantitative TEM is currently the only method that can be used to determine conclusive asbestos content.

This report must not be reproduced except in full without written approval of Analytical Environmental Services, Inc.

Microanalyst:

Penka Topuzova

QC Analyst:

Yelena Khanina



ANALYTICAL ENVIRONMENTAL SERVICES, INC.
Bulk Sample Summary Report



Lab Code 102082-0

24-Jul-18

Client Name: **GeoTechnical & Environmental Consultants**

AES Job Number: **1807F91**

Project Name: **FAIRTAX**

Project Number: **180478.341**

Client ID	AES ID	Location	Asbestos Mineral Percentage						Comments
			CH	AM	CR	AN	TR	AC	
DPM-13 Layer: 1	1807F91-013A	Slab Underlayment	ND	ND	ND	ND	ND	ND	Felt
DPM-14 Layer: 1	1807F91-014A	Foundation Coating	ND	ND	ND	ND	ND	ND	
DPM-15 Layer: 1	1807F91-015A	Foundation Coating	ND	ND	ND	ND	ND	ND	

Note: CH=chrysotile, AM=amosite, CR=crocidolite, AC=actinolite, TR=tremolite, AN=anthophyllite

For comments on the samples, see the individual analysis sheets.

ND = None Detected

AES, Inc. is accredited by NIST's National Voluntary Laboratory Accreditation Program (NVLAP) for Polarized Light Microscopy (PLM) analysis, Lab Code 102082-0. All analyses performed in accordance with EPA "Interim Method for the Determination of Asbestos in Bulk Insulation Samples" (EPA 600/M4-82-020), 1982 as found in 40 CFR, Part 763, Appendix E to Subpart E and "Method for the Determination of Asbestos in Bulk Building Materials" (EPA/600/R-93/116), 1993.

These test results apply only to those samples actually tested, as submitted by the client. All percentages are reported by visually estimated volume.

PLM is not consistently reliable in detecting small concentrations of asbestos in floor tiles and similar nonfriable materials, quantitative TEM is currently the only method that can be used to determine conclusive asbestos content.

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Microanalyst:

Penka Topuzova

QC Analyst:

Yelena Khanina



Photo 1:

Pieces of wood with lead base paint

8-2-2018



Photo 2:

Paint off of concrete containing lead based paint.

8-2-2018

APPENDIX 5

Solid Waste Management

Management of Demolition Waste

All debris resulting from demolition of residential, commercial and industrial buildings is regulated solid waste. Certain items, such as uncontaminated concrete, brick and blocks, aged asphalt and soil are not regulated and may be managed differently if separated; these items are not required to be disposed of in a permitted landfill.

Asbestos-containing materials require special care and handling. Contact the Special Services Section, Air Division, ADEM, 334-271-7879, for requirements for asbestos management. Asbestos-containing materials may be disposed of in any permitted landfill in Alabama with written approval from ADEM, following the special waste provisions found in ADEM regulations at ADEM Admin. Code 335-13-4-.26(2). The solid waste regulations are available on the ADEM Internet web site at www.adem.state.al.us/regulations/div13.

Materials containing lead-based paint, such as painted wood, metal, concrete, brick or blocks, must be disposed of properly. If the material comes from deconstruction, demolition or maintenance of a residential structure, the lead-based paint items may be disposed of in any permitted landfill. If the lead-based paint items come from deconstruction, demolition or maintenance of any other structure, the material must be disposed of in a lined landfill built with leachate collection and groundwater monitoring.

As a safeguard for the owner of property being demolished or the entity responsible for demolition of the structure, ADEM recommends the demolition contract should require that receipts be presented by the demolition contractor showing that demolition waste was taken to a permitted landfill. The incidence of illegal dumping of demolition debris in Alabama is very high, and creation of an illegal dump could result in enforcement action by ADEM against the person dumping, the person hiring the person dumping as well as the landowner where dumping occurs.

Questions regarding disposal of non-hazardous solid waste in Alabama should be directed to the Waste Programs Branch, ADEM, 334-271-7988. A list of permitted landfills in the State of Alabama is available on the ADEM Internet web site at:

www.adem.state.al.us/LandDivision/SolidWaste/Reports/Landfill.htm



Photo 1: Northern view of western property line of subject property.



Photo 2: Southwestern view from southwest corner of subject property.



Photo 3: Western view from southwest corner of subject property.



Photo 4: Northwestern view from southwest corner of subject property.



Photo 13: Northern view of former cotton mill building footprint.



Photo 14: Southern view of former cotton mill building footprint.



Photo 15: Southern view of adjacent Humane Society property.



Photo 16: "Covered" manhole on subject property.



Photo 17: Photo of demolition debris on the subject property.



Photo 18: Photo of the remaining portion of the onsite reservoir. Filled with demo debris.



Photo 19: Photo of demo debris on northern portion of subject property.



Photo 20: Southwestern view from northern portion of subject property.



Photo 25: Northern view from eastern boundary of subject property.



Photo 26: Eastern view from eastern boundary of subject property



Photo 27: Southern view from eastern boundary of subject property



Photo 28: Northwestern view from eastern boundary of subject property



Photo 29: Photo of demo debris from northern property line.



Photo 30: Photo of fire department training area to the north of the subject property.



Photo 31: Photo of former building pads.



Photo 32: Eastern view from northeastern corner of subject property.



Photo33: Southern view from northeastern corner of subject property.



Photo 34: Southwestern view of subject property from northeastern corner of subject property.



Photo35: Northern view from northeastern corner of subject property.



Photo36: Western view from northeastern corner of subject property.



Photo37: Demo debris located on subject property.



Photo 38: Demo debris located on subject property.



Photo39: Demo debris located on subject property.



Photo 40: Photo of building pad of former cotton mill.



Photo41: Demo debris located on western portion subject property.



Photo 42: Photo of subfloor access portal.



Photo43: Photo of manhole located on site.



Photo 44: Northern view from southeastern corner of subject property.



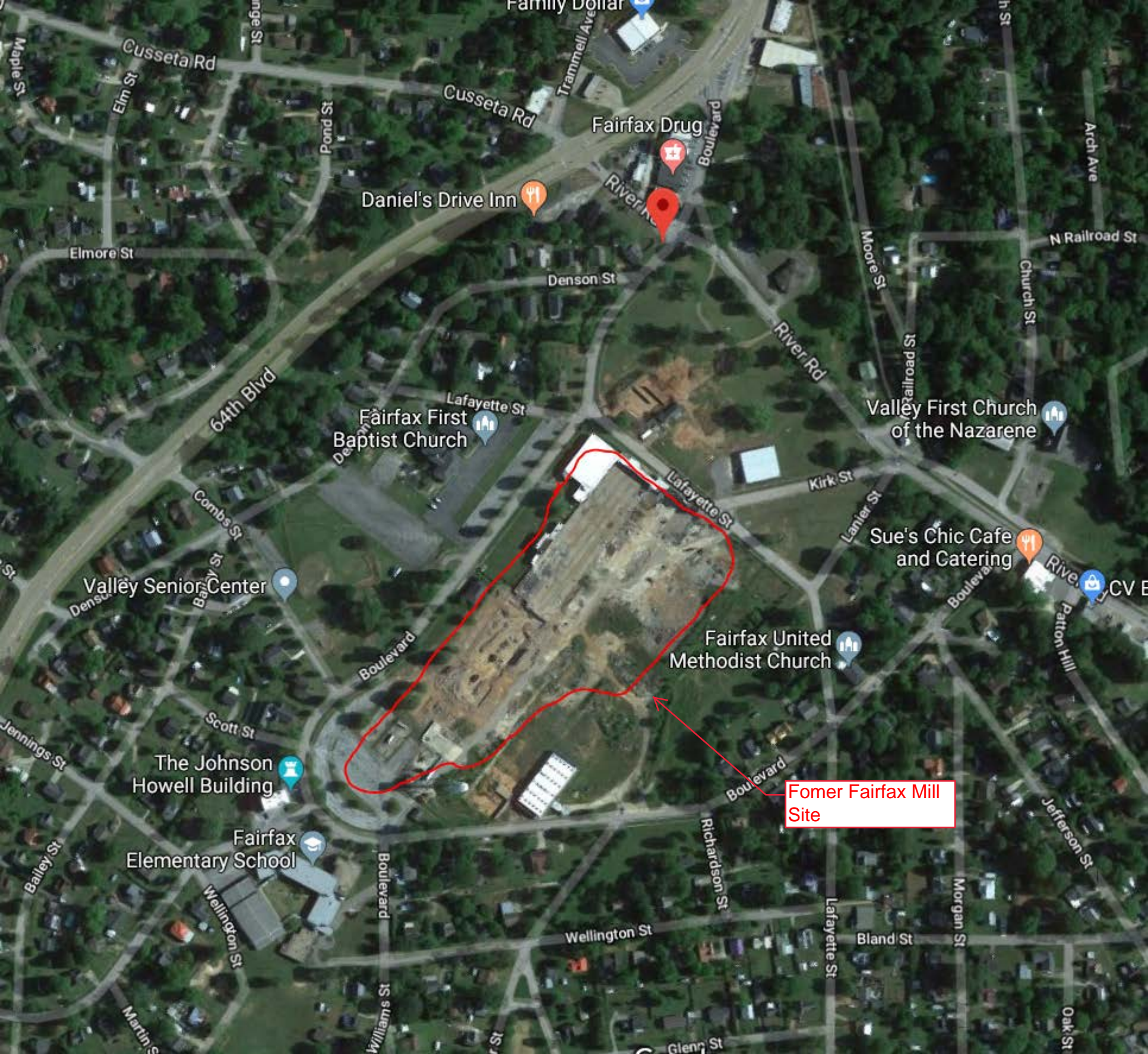
Photo45: Western view from southeastern corner of subject property.



Photo 46: Eastern view from southeastern corner of subject property.



Photo47: Southern view from southeastern corner of subject property.



Daniel's Drive Inn

Fairfax Drug

Fairfax First Baptist Church

Valley First Church of the Nazarene

Sue's Chic Cafe and Catering

Fairfax United Methodist Church

The Johnson Howell Building

Fairfax Elementary School

Former Fairfax Mill Site

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

01/30/2019

4. Applicant Identifier:

City of Valley

5a. Federal Entity Identifier:

630795243

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

City of Valley

* b. Employer/Taxpayer Identification Number (EIN/TIN):

* c. Organizational DUNS:

1394407180000

d. Address:

* Street1:

PO Box 186

Street2:

* City:

Valley

County/Parish:

* State:

AL: Alabama

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

368540000

e. Organizational Unit:

Department Name:

Planning and Development

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

* First Name:

Travis

Middle Name:

* Last Name:

Carter

Suffix:

Title:

Director

Organizational Affiliation:

* Telephone Number:

3347565249

Fax Number:

* Email:

tcarter@cityofvalley.com

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-18-07

* Title:

FY19 GUIDELINES FOR BROWNFIELDS CLEANUP GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

1235-Aerial View of Former Fairfax Mill, Va

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

City of Valley Brownfield Cleanup Grant Application FY 2019

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant

3rd

* b. Program/Project

3rd

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

10/01/2019

* b. End Date:

09/30/2022

18. Estimated Funding (\$):

* a. Federal	500,000.00
* b. Applicant	100,000.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	600,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:

* First Name:

Travis

Middle Name:

* Last Name:

Carter

Suffix:

* Title:

Director

* Telephone Number:

3347565249

Fax Number:

* Email:

tcarter@cityofvalley.com

* Signature of Authorized Representative:

Kathy Snowden

* Date Signed:

01/30/2019